



GREEN CLAIMS

MANUFACTURERS

SYNDICATED PRODUCT CONTENT

FACT SHEET EmpCo Directive (EU) 2024/825

**SUSTAINABILITY
CLAIMS MUST BE
SUBSTANTIATED
FROM 27.09.2026.**



EMPCO FACT SHEET

What applies to environmental claims from 27 September 2026 – and how to review the content you syndicate via loadbee in time.

On **27 September 2026**, the EU directive on “empowering consumers for the green transition through better protection against unfair practices and through better information” (**EmpCo**, Directive (EU) 2024/825) becomes binding. In Germany it is implemented through the third amendment to the Act against Unfair Competition (UWG). The directive introduces significantly stricter rules for sustainability claims in consumer communication.

This also covers **product content that manufacturers syndicate to retailers via platforms such as loadbee** – product descriptions, attributes, product images and videos. Major retail partners have started to pass these requirements on to their industry partners and to require compliance for the content they embed.

This fact sheet summarises the key requirements so that you can review the content you publish via loadbee in good time.

GREEN CLAIM

What counts as an environmental claim?

Any statement, image, video or design element that communicates an environmental, climate or resource benefit.

Green claims are not limited to text – symbols, imagery, colour schemes and visual design elements can also fall within scope.

That is particularly relevant for syndicated product content, because a large share of it is visual.

TYPICAL EXAMPLES

sustainable · environmentally friendly · climate friendly · green · eco · energy efficient · resource saving · uses less water/energy · made from recycled materials · durable · repairable · refurbished · trade-in · extends product life

EFFECTIVE

27 September 2026

LEGAL BASIS

Directive (EU) 2024/825 (EmpCo) · German implementation: third UWG amendment

IN SCOPE

Product texts and attributes · images and videos · all content syndicated via loadbee



DON'T

Avoid generic environmental claims

Blanket statements that claim a broad environmental benefit without explaining what exactly makes the product more sustainable are not permitted from the effective date.

- 👎 Sustainable products
- 👎 Environmentally friendly appliances
- 👎 Climate friendly technology
- 👎 Green products
- 👎 Good for the environment
- 👎 Protecting the climate
- 👎 For a better future
- 👎 Shop more sustainably

Also critical: climate neutrality claims based **solely on offsetting**, as well as **in-house sustainability labels without a recognised certification scheme**.

DO

Use specific, substantiated claims

Specific claims remain permitted provided they clearly explain the environmental benefit and can be substantiated. Suitable evidence includes:

- 👍 EU energy labels
- 👍 Repairability classes and calculations
- 👍 Verified figures on recycled content
- 👍 Third-party certifications
- 👍 Recognised studies and standards
- 👍 Product-specific technical documentation

EXAMPLES OF PERMITTED CLAIMS

"This refrigerator has energy efficiency class A and consumes less electricity in use."

"This smartphone has repairability class A, which makes repairs easier and helps extend its service life."

"This laptop bag contains certified recycled materials."



CHECKLIST

Compliant sustainability communication

Please make sure that sustainability-related claims in your content:

- ☐ Are true and accurate
- ☐ Clearly specify what exactly is more sustainable
- ☐ Explain the environmental benefit in an understandable way
- ☐ Can be substantiated by recognised evidence, certifications or product data
- ☐ Are easy for end customers to understand
- ☐ Go beyond legal obligations or standard product features
- ☐ Also meet these requirements in images, videos, symbols and colour schemes
- ☐ Come with the required explanation in the same medium

EFFECTIVE: 27 SEPTEMBER 2026

SUPPORT FROM LOADBEE

Do you need support using the loadbee platform? Whether you have questions about features, available content or export options: our team is happy to help. Just get in touch with us.

RESPONSIBILITY & NEXT STEPS

Content on the loadbee platform

loadbee provides software for the service-based distribution of product information and acts as a host provider with regard to the data uploaded by the manufacturer. The product data is not reviewed for content.

Pursuant to **§ 6 (4) and (5) of the General Terms and Conditions of loadbee GmbH for manufacturers:**

- ☒ Reviewing the **content, accuracy and completeness** of the data uploaded to the loadbee platform is **the sole responsibility of the manufacturer**.
- ☒ The manufacturer is **solely responsible** for the **lawfulness** of the data it uploads.

This expressly includes all environmental and sustainability claims in product texts, attributes, images, videos and other content elements. Responsibility for the EmpCo compliance of this content therefore rests with the manufacturer.

What you should do now

Review existing content in your loadbee account **by 27 September 2026** for generic environmental claims and replace or remove them with specific, substantiated wording. Extend the review to **visual elements**: images, videos, symbols, colour schemes.

Map and document evidence (energy label, repairability class, certificates, technical documentation) against the relevant claims. Adjust internal **approval processes** for future product content accordingly.

Arrange for a legal review in case of doubt.

**NO LEGAL ADVICE****Legal notice**

This fact sheet is provided for general information only and represents an **abridged summary of selected legal requirements**. It is not exhaustive, does not replace reading the applicable legislation and does **not constitute legal advice**.

loadbee does not provide legal services and neither reviews the manufacturer's content from a legal perspective nor warrants the completeness or accuracy of the information presented here. Any liability of loadbee for the EmpCo compliance of content uploaded by the manufacturer is excluded.

Whether specific claims, images or design elements meet the legal requirements is always a question of the individual case. **In case of doubt, the manufacturer must arrange for such a review itself – for example through its legal department or external legal counsel.**

**Questions about editing
your content?**support@loadbee.com →

Legal background: Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information. Official text available via EUR-Lex. Implemented in Germany through the third act amending the Act against Unfair Competition.