

Background

EmpCo, short for Empowering Consumers for the Green Transition (EU 2024/825), is an EU directive intended to protect consumers from misleading sustainability claims and labels. It amends the existing EU Unfair Commercial Practices Directive and entered into force in March 2024, applying from **September 2026**.

EmpCo applies to business-to-consumer (B2C) claims communicated on products and in wider marketing materials. In particular, it introduces restrictions on the use of sustainability certifications and generic or unsubstantiated sustainability claims.

FSC® Trademark – new version

To accommodate EmpCo and to simplify and improve the use of FSC®'s trademarks, on product and promotional, FSC® are introducing a revised version of their trademark standard. These are available at [Document | FSC Connect](#) (revision to **main trademark use** standard) [Document | FSC Connect](#) (addendum for **promotional** statements) – effective date 1st July 2026 with a transition period between the old and new version until January 2029.

- While there are amendments from version V2-1, our current specification rules regarding sizing and positioning and the mandatory elements required for the label are already compliant with V3-0. Therefore, we propose **no changes** to our current procedures.

- **No accompanying wording** that references FSC®, Forest Stewardship Council® or the FSC® tree logo may be used alongside our FSC® label.

- The fact that the FSC® label, imprint page, and the FSC® tree logo, cover, jacket or cover for case appear in a book is sufficient to prove that the materials used are FSC® approved and audited as such.

- **In V3-0 it is mandatory** to display FSC®'s website address, our labels already include this, meaning that should the consumer wish to find out more about what being FSC® certified means, they can access directly from FSC®.

Further Sustainability Claims

EmpCo additionally establishes wider **principle-based** requirements on the content of consumer-facing sustainability claims, prohibiting:

- Generic statements such as products being “environmentally friendly” or “green”
- Carbon footprint claims relying on carbon offsets outside the value chain
- Future-oriented claims without a supporting implementation plan

As a non-EU company, Clays has no direct legal obligations under EmpCo. Responsibility for compliance rests with the publisher or the entity placing products on the EU market once the legislation takes effect. **We therefore recommend** that any sustainability claims potentially falling within scope of EmpCo are reviewed against the requirements to ensure compliance.

At Clays, we have always aimed to ensure any sustainability claims **align** with the principles reflected in EmpCo, ensuring that statements are accurate, specific, verifiable, contextualised and substantiated. We already operate in line with the pre-existing [UK Green Claims Code](#), launched in 2021, which sets out the guiding principles for environmental claims made by UK businesses to consumers.

We consider this **good ethical practice**, regardless of the existence of EmpCo or regulatory enforcement, and encourage the use of credible, robust sustainability communications to drive genuine environmental improvement and enable consumers to make **informed choices**.

Summary

For **FSC®**, we suggest that no changes are required and customers continue to use our FSC® labels and logo as per the existing procedures regarding sizing and positioning. No accompanying wording that relates to FSC® in any way should be used.

For any other **sustainability claims**, we recommend that the relevant entity carries out an assessment against EmpCo requirements to ensure compliance.

Please note that the information in this document reflects our interpretation of the EmpCo directive. We advise our customers to seek legal advice to understand their compliance obligations under EmpCo.

Further Information

For more information on the sustainability initiatives in place at Clays, please see our website page here [Sustainability – Clays](#)

For more information on EmpCo, please see the legislative text here [Directive - EU - 2024/825 - EN - EUR-Lex](#)