ENVIRONMENT SEMINAR 2026 | SESSION REPORT

Environmental claims and certification under scrutiny

EU consumer protection and greenwashing

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Ben Worth — Director of Development, Vegetarian Society

Ben Worth is director of development at the Vegetarian Society, a charity founded in Salford in 1847. He works with the Society's vegetarian, vegan and plant-based product certification programmes and presented on the implications of EU consumer protection rules for claims and marks used on packaging.

KEY FINDINGS

- EU EmpCo provisions have applied through national legislation since September 2026.
- Visual imagery and colour can convey an environmental claim, depending on context.
- Dietary suitability marks are not automatically sustainability labels.
- Artwork approval, substantiation and existing stock warrant careful review.

FULL SESSION REPORT

Foodservice packaging manufacturers, brands and retailers should review environmental claims, symbols and certification marks appearing on products sold to EU consumers as new rules increase scrutiny of potentially misleading sustainability messages, Ben Worth told the Environment Seminar.

New rules on greenwashing

Worth discussed Directive (EU) 2024/825, known as Empowering Consumers for the Green Transition (EmpCo), which strengthened existing EU consumer protection law. The Directive entered into force in March 2024, with member states required to apply national implementing measures from 27 September 2026.

The rules restrict generic claims such as 'eco-friendly', 'green' and 'environmentally friendly' where recognised excellent environmental performance relevant to the claim cannot be demonstrated. They also prohibit certain product greenhouse-gas impact claims based on offsetting outside the product's value chain. Sustainability labels must be based on qualifying certification schemes or established by public authorities.

Environmental messages can be visual

Worth stressed that consumers can interpret packaging artwork as making environmental promises even where no express claim appears in the wording. Leaves, trees, wildlife imagery, certain colours and badge-like symbols may contribute to an impression of environmental benefit, depending on the overall presentation.

Such imagery is not automatically unlawful. The risk arises where the combined message is misleading or cannot be substantiated. Similarly, terms such as compostable, biodegradable and recyclable must be assessed in their particular context, supported by appropriate evidence and, where necessary, suitably qualified.

The Vegetarian Society's approach

Worth explained that the Vegetarian Society operates certification schemes for vegetarian, vegan and plant-based products appearing on approximately 20,000 products worldwide. Questions from customers including Ferrero and Lidl prompted the organisation to review how its marks might be treated under the new rules.

He explained that the Society's marks concern dietary suitability rather than claims that the products are environmentally superior. In the Society's assessment, they should not automatically be classified as sustainability labels. The precise position nevertheless depends on how marks are presented and what consumers are likely to infer.

The organisation had strengthened the formal certification status of its marks and worked with customers to clarify their purpose and credentials.

What manufacturers should do

Packaging manufacturers may encounter claims on their own branded products or on artwork supplied by customers. Worth encouraged businesses to identify which party is responsible for developing and approving each claim, particularly where technical, legal and marketing teams have different assessments of the risk.

His practical recommendations included auditing text, graphics and logos; checking substantiation for environmental attributes; reviewing certification arrangements; clarifying contractual responsibilities; and introducing approval processes with appropriate technical and legal input.

He also urged businesses to consider inventories and future print runs. The provisions can be relevant to existing consumer-facing products, although European authorities have said they will consider genuine transitional difficulties involving stock proportionately. An automatic recall of all existing packaging should not be inferred.

Beyond compliance: trust and supply chains

Worth also described growing attention to ethical and dietary claims beyond product ingredients, including packaging components such as adhesives and closures. He reported research commissioned by the Society suggesting that many vegetarian and vegan consumers actively seek its marks when shopping.

His central message was that certification and environmental communication are only valuable where claims are clear, reliable and appropriately supported. For the foodservice packaging sector, that calls for closer coordination between manufacturers and customers and more rigorous scrutiny of the messages presented to consumers.

SESSION PHOTOGRAPHY





PRESENTATION MATERIALS

Download a PDF of the presentation slides here

Source and publication note

This session report is intended to be an overview and is not a verbatim transcript.