

EmpCo and SURE-EU

Requirements for sustainability labels and sustainability communication

From 27 September 2026, new requirements introduced by Directive (EU) 2024/825, commonly known as the “Empowering Consumers for the Green Transition” Directive or “EmpCo”, apply through national implementing legislation. In Germany, the relevant provisions are implemented through amendments to the Act Against Unfair Competition (UWG).

The rules strengthen protection against misleading environmental claims and unreliable sustainability labels in commercial communication directed at consumers. They supplement existing obligations to provide accurate and substantiated information. [European Commission guidance](#)

SURE-EU certification and the EmpCo framework

Sustainability labels used in consumer-facing commercial communication must be established by a public authority or based on a certification scheme meeting the applicable legal requirements. These include transparent, fair and non-discriminatory access, publicly available requirements, consultation with relevant experts and stakeholders, independent monitoring, and procedures addressing non-compliance. [EmpCo requirements for certification schemes](#)

SURE-EU is a voluntary certification scheme recognised by the European Commission under the Renewable Energy Directive, Directive (EU) 2018/2001, as amended. Within its recognised scope, it provides evidence concerning the applicable sustainability and greenhouse gas emissions saving requirements for biomass fuels and their use in electricity, heating and cooling production. The relevant requirements depend on the certified activities and feedstocks. [SURE-EU scope and basic requirements](#)

Transparency, independent verification and scheme integrity

The SURE-EU scheme incorporates the following safeguards:

- ✓ **Independent verification:** Compliance with scheme requirements is assessed through regular audits by certification bodies approved for SURE-EU. The certification process includes documented requirements for competence, independence and impartiality. [Certification requirements](#)
- ✓ **Transparency:** Scheme requirements, certification procedures and trademark rules are publicly accessible. Certification status can be checked through the public certification database. [Scheme Documentation](#)

- ✓ **Documented participation conditions:** Registration, certification and contractual arrangements define the requirements for participation and the rights and obligations of scheme participants and certification bodies. [Participation requirements](#)
- ✓ **Expertise and stakeholder involvement:** SURE's governance arrangements provide for technical advice and stakeholder dialogue in developing and implementing scheme requirements. [SURE-EU governance](#)
- ✓ **Integrity management:** Documented procedures address complaints, suspected breaches and non-compliance. Depending on the findings, measures may include corrective action, certificate suspension or withdrawal, restrictions on participation, and withdrawal of trademark-use rights, in accordance with the applicable procedures and responsibilities. [Integrity management](#)

Use of the SURE name and logo

Use of the SURE name and logo is subject to the applicable trademark rules. For scheme participants, a valid certificate is required; a participation contract alone does not confer logo-use rights.

Logo use must not imply certification of the company as a whole. Statements about certification status must link to the certification database, and use of the logo on a participant's website must link to the SURE website.

The SURE logo may not be displayed on products, labels or packaging. A participant's right to use the logo expires when no valid certificate is available. [SURE trademark rules, sections 5.1–5.3](#)

Accurate communication and legal responsibility

Claims referring to SURE-EU certification must accurately describe the certified scope and the characteristics supported by the relevant evidence. They must not imply that uncertified activities or products are covered. Statements about certified quantities must also reflect the applicable [traceability and mass-balance rules](#).

Certification does not automatically substantiate broader claims such as “environmentally friendly” or “climate neutral”. Recognition of SURE-EU under the Renewable Energy Directive does not constitute approval of individual advertising claims.

Each business remains responsible for ensuring that its communications comply with applicable consumer-protection and unfair-competition law. Permission to use the SURE trademark does not replace that responsibility. [Rules against misleading commercial practices](#)

Further information

The applicable scheme documents and contractual conditions govern certification and trademark use. This information does not extend the rights granted under those documents.

- ✓ [SURE-EU scheme documents and trademark rules](#)
- ✓ [Public certification database](#)
- ✓ [European Commission questions and answers on EmpCo](#)