

Position statement

Use and status of the International EPD System logotype and published EPDs under Directive (EU) 2024/825

INTENDED AUDIENCE LCA consultants, manufacturers, EPD owners, verifiers and other market participants

STATUS Interim guidance. Not legal advice. National implementation and enforcement may differ.

Executive position

CORE POSITION

A neutral IES EPD document does not, on its own, amount to a green claim or constitute a sustainability label. It provides quantified, third-party verified information and does not state that a product is sustainable, environmentally preferable, certified or endorsed. However, logos, trust marks and other EPD-related graphics used in consumer-facing product communication may require separate assessment under the sustainability-label provisions of Directive (EU) 2024/825.

The regulatory assessment changes when the International EPD System logotype, traceability logotype, an EPD or data taken from an EPD is used in B2C commercial communication. Function, placement, surrounding claims, visual presentation and the likely understanding of the average consumer must then be assessed.

A. International EPD System logotype

Status and permitted meaning

The logotype identifies the programme under which an EPD is published. In the EPD document, its function is programme identification and traceability. It does not mean that the product or manufacturer is certified by EPD International, environmentally superior, green, sustainable or climate friendly.

EmpCo classification risk in B2C communication

A consumer-facing logotype may fall within the sustainability-label rules where its use sets apart and promotes a product by reference to environmental characteristics. The same graphic may have a different legal character in different contexts. Programme identification inside an EPD is not the same use as a badge on packaging or beside a purchase button.

Current use guidance

- Retain the logotype on a published EPD as required by programme rules.
- For neutral references, state that the product has a published, independently verified EPD and link to the EPD Library.
- Do not detach the general IES logotype from its programme-identification context and use it as a product merit badge.
- Do not describe the logotype as an ecolabel, quality seal, product certification or proof of EmpCo compliance.

B. Status of an EPD published with the logotype

What publication establishes

- A specific declaration has been published within the International EPD System.
- The EPD reports quantified lifecycle environmental information under applicable programme and product category rules.
- The information has undergone the independent verification required by the programme.

What publication does not establish

- That the declared product is sustainable, green, environmentally friendly or environmentally preferable.
- That the product or manufacturer is certified by EPD International.
- That every statement derived from the EPD is accurate, complete or lawful in a later advertisement.
- That EPD values are comparable without equivalent units, boundaries, methods, assumptions, data quality and other relevant conditions.

PREFERRED WORDING

This product has an Environmental Product Declaration published in the International EPD System. The EPD provides third-party verified, lifecycle-based environmental information for the declared product and scope. The declaration is available in the EPD Library. A neutral EPD is an information document and does not state that the product is environmentally superior. Any EPD-related logo or graphic used in consumer-facing communication must be assessed in its complete context.

Scope, responsibility and review status

The amendments apply from 27 September 2026. The trader making the commercial communication remains responsible for it. Publication or verification of an EPD is not approval of subsequent packaging, advertising, product names, imagery or campaigns. This interim position should be updated following a documented certification-scheme assessment or authoritative national or judicial guidance.

Sources

- Directive (EU) 2024/825.
- EmpCo memorandum, Dugardyn & Partners to ECO Platform, 31 August 2026.
- Guide till Empowering Consumers-direktivet, CommToAct Planet, 16 June 2026.