



EU Directive 2024/825 and COSMOS-certified products: what retailers need to know

June 2026

Dear partner,

A new EU law — **Empowering Consumers for the Green Transition (Directive (EU) 2024/825, ECGT Directive)** — applies from **27 September 2026**. It introduces strict new rules on how environmental and sustainability claims can be made to consumers by manufacturers and by retailers alike. This note explains what it means for your COSMOS-certified range and for your own in-store and online communications.

This document complements the former paper (EXT)-2026-060 published in May 2026.

B.1 — COSMOS-certified products can stay on your shelves

The Directive bans sustainability labels unless they are based on a qualifying independent certification scheme or established by a public authority. based on our current legal assessment, the COSMOS scheme meets the requirements:

- ✓ **Scheme rules publicly available** — the COSMOS standard and all CB details are freely published on cosmos-standard.org.
- ✓ **Open access on equal terms** — any cosmetics company in the world can apply, under identical conditions.
- ✓ **Standard developed with stakeholder input** — revisions follow a structured consultation process involving brands, scientists, CBs and industry bodies, with records archived.
- ✓ **Non-compliance procedures in place** — non-conformities trigger corrective actions, suspension or certificate withdrawal. The mark cannot be used without a valid certificate.
- ✓ **Independent third-party auditing** — COSMOS-standard AISBL does not issue certificates. All audits are conducted by separate, ISO 17065-accredited Certification Bodies.

✓ No action needed on your COSMOS-certified product range

Based on our current legal assessment, and provided the brand's certificate is current and their Certification Body remains accredited, COSMOS ORGANIC and COSMOS NATURAL products are fully compliant to stock and sell after 27 September 2026. You can verify any product's certification status on cosmos-standard.org.

B.2 — Why the COSMOS mark is a reliable basis for your product selection and communications

The COSMOS mark is not just a label, it is the visible output of a rigorous, independently verified certification scheme. For your customers, that means reliable, comparable product selection criteria. Here is what underpins it:

- ✓ **Scope is defined:** certification applies to clearly identified products and categories, so there is no ambiguity about what is and is not covered by the mark.
- ✓ **Criteria are public and specific:** all requirements are documented and freely accessible on cosmos-standard.org, enabling informed decision-making by brands, retailers and consumers.
- ✓ **Claims are controlled:** logo use and claim wording are subject to defined rules, reducing the risk of overstatement and protecting the integrity of the mark.
- ✓ **Evidence is auditable:** compliance is supported by documentation and verified on-site by accredited Certification Bodies operating under ISO 17065, ensuring independence from both COSMOS-standard AISBL and the certified company.

Certification is not a one-off statement. Conformity is maintained through defined surveillance processes, and certificates can be suspended or withdrawn in the event of non-compliance.

What this means for your business

COSMOS gives you a credible, comparable and independently verified selection criterion for your natural and organic cosmetics range. It reduces your legal and reputational risk by providing a documented basis for the environmental and natural claims associated with the products you stock and promote.

B.3 — Where you need to act: your own environmental communications

The Directive applies to anyone communicating environmental claims to consumers, including retailers. Your shelf labels, category signage, promotional materials, website and catalogue are all in scope.

Section or category labels using green terms

Headers such as "*Green Beauty*", "*Eco Cosmetics*", "*Natural & Sustainable*" are now generic environmental claims. They are banned unless every product grouped under that label can individually demonstrate recognised environmental performance. The presence of COSMOS-certified products in a range is not sufficient justification for a category-level green label.

Promotional materials and advertising

Describing a product range as "eco-friendly", "sustainable" or "green" in flyers, banners or social media requires product-by-product substantiation through a recognised certification or a verifiable performance claim. You may reference the COSMOS mark where it applies; applying broad green language to uncertified products alongside certified ones is not permitted.

Own-label and private label products

If you sell cosmetics under your own brand, you carry the same responsibilities as any manufacturer for environmental claims on those products. If your own-label range carries the COSMOS mark, it is your strongest asset under the new rules. If it uses environmental language without the COSMOS mark, review those claims before September 2026.

The retailer is also responsible

A misleading environmental claim is the responsibility of whoever makes it to the consumer, not just the manufacturer. If you place a product in a “sustainable” section or describe it as “eco-friendly” in your own communications, that claim is yours.

B.4 — Practical steps before September 2026

- **Check the certification status of COSMOS products you stock** — verify on cosmos-standard.org.
- **Review your in-store and online environmental language** — section headers, shelf-edge labels, catalogues and website category pages.
- **Check any other sustainability labels or trust marks** you display or promote; each must be based on a qualifying scheme or established by a public authority.
- **If you have own-label cosmetics with environmental claims**, review those claims or consider pursuing COSMOS certification.

Questions?

We will publish further guidance on cosmos-standard.org ahead of the September 2026 deadline. You can also verify any product’s certification status on our website.

In the meantime, please direct any question to this dedicated COSMOS inbox: compliance-emco@cosmos-standard.org.