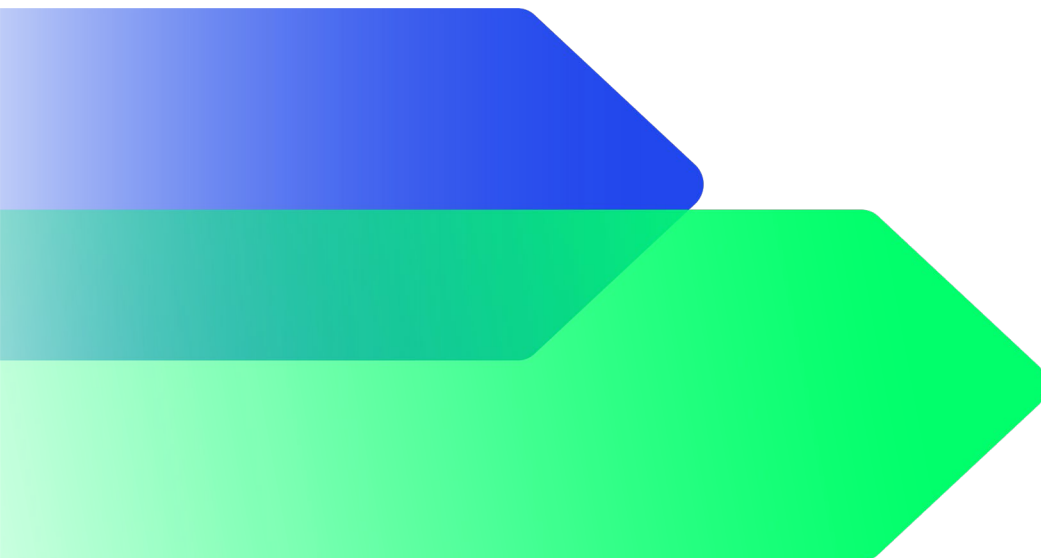




THE CARBON TRUST

# Carbon Trust Scheme Owner Limited

Certification Scheme Requirements under Directive (EU) 2024/825 on Empowering Consumers for the Green Transition ('Directive')



The new Directive on Empowering Consumers for the Green Transition (Directive (EU) 2024/825, ECGT Directive) amends two existing consumer directives: the Unfair Commercial Practices Directive (Directive 2005/29/EC, UCPD) and the Consumer Rights Directive (Directive 2011/83/EU, CRD).

The Directive (EU) 2024/825 on Empowering Consumers for the Green Transition ('ECGT Directive') will be transposed to national legislation by 27 March 2026 and will become effective on 27 September 2026. The ECGT Directive will ban the use of sustainability labels that are not based on a certification scheme or not established by public authorities. A 'certification scheme' is clearly defined as a third-party verification scheme that certifies a product, process, or business as compliant with specified requirements (as set out in Article 2(1)(s)).

As of today, we believe we are compliant based on the [published information](#) regarding the ECGT Directive. As preparation for compliance, the Carbon Trust Label Scheme has taken the following steps towards alignment.

## **REQUIREMENTS FOR A CERTIFICATION SCHEME (ARTICLE 2(1)(S) OF THE ECGT DIRECTIVE):**

### **Certification must be based on independent third-party verification.**

Our Carbon Label Conformity Assessment System (CAS), comprising of multiple schemes, is owned by Carbon Trust Scheme Owner Ltd (CT SO Ltd.), a legally independent subsidiary of the Carbon Trust Group. The use of any associated certification labels is licensed and managed via CT SO Ltd. Verification against individual Scheme requirements is conducted by CT Assurance Ltd or other CT SO Ltd approved Conformity Assessment Bodies (CABs).

### **Compliance must be monitored by a competent, independent third party, in line with international, Union, or national standards (e.g. ISO 17065, or mechanisms provided for in Regulation (EC) No 765/2008 etc).**

Monitoring of a trader's compliance with the scheme requirements is conducted by CT Assurance Ltd or other CTSO Ltd approved Conformity Assessment Bodies (CABs).

All CT SO Ltd approved CABs must:

- Demonstrate accreditation (or a commitment to achieving accreditation) to ISO/IEC 17029, ISO 14065 and ISO 14066. Accreditation must be provided by a National Accreditation Body that is a signatory of the IAF Multilateral Recognition Agreement (MLA) for 17029 and 14065 product certification;
- Successfully complete training on the relevant CT SO Ltd Scheme Category and a designated number of 'pilot verifications' as means of assessing competence;
- Commit to ongoing oversight and monitoring by CT SO Ltd to maintain ACAB status.

### **The scheme's requirements and terms must be publicly available.**

The Product Carbon Footprint label is a verification scheme within the carbon label CAS and is based on established international carbon footprint standards (e.g. ISO 14067) and our own scheme requirements, which are publicly available via the following web link: [Carbon footprint labelling | The Carbon Trust](#).

**The scheme must be transparent, credible, open to all traders under fair and non-discriminatory terms, and open to all traders willing and able to comply (non-exclusivity).**

Scheme requirements are publicly available and the scheme is open to all traders willing to comply with those requirements. The scheme requirements are reviewed by a Technical Stakeholder Committee and the scheme is aligned with the impartiality requirements set out in ISO 17029 and ISO 14065.

**The scheme owner sets the requirements in consultation with relevant experts and stakeholders.**

The CAS requirements are based on all three internationally recognised product carbon footprinting standards (ISO 14067, PAS 2050 and the GHG Protocol Product Lifecycle Accounting and Reporting standard). CT SO Ltd has appointed a Technical Stakeholder committee (consisting of representatives from the Carbon Trust Group, GHG accounting standard development, CTSO Ltd approved CABs, and traders) as a further review mechanism.

**The scheme must allow for the use of a corresponding sustainability label**

Compliance with the Certification Scheme results in a trust mark, quality mark or equivalent that meets the criteria of the sustainability label as defined in the ECGT Directive, i.e., it aims to set apart and promote a product, a process or a business by reference to its environmental or social characteristics, or both, and is intended to be used on consumer products or communications.

The Verified Product Carbon Footprint Label is provided for reference below. Full details of available CAS sustainability labels can be found via the following link: [Carbon footprint labelling | The Carbon Trust](#)



**The scheme sets out procedures for dealing with non-compliance with the scheme's requirements and provides for the withdrawal or suspension of the use of the sustainability label by the trader in case of non-compliance with the scheme's requirements**

The CT SO Ltd CAS has clearly defined procedures for addressing non-compliance with its requirements. Prior to engaging with any company (trader), we conduct our own due diligence process, which includes a thorough evaluation of their proposed activities using our internal Mission Impact Assessment and Label Eligibility tool. This ensures alignment with our sustainability standards and ethical commitments from the outset.

In addition, we deploy our team of sustainability communication experts to assess the trader's public claims and their intended use of the sustainability label. This helps to ensure that all communications are accurate, transparent, and consistent with the values of the scheme.

All traders enter into a legally binding agreement with us, which explicitly outlines the terms of label usage and compliance expectations. In the event of non-compliance—particularly in cases of wilful misuse of the label—we reserve the right to revoke or suspend the trader's right to use the label. This mechanism ensures the integrity of the scheme and maintains trust among stakeholders.

#### **FOR FURTHER INFORMATION:**

The Carbon Trust team is happy to provide further information or clarification on the Carbon Trust label's alignment with key regulation as required. [Get in touch.](#)

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