

Cologne, 24 February 2026

GGN label: Action required from license holders (EmpCo directive update)

Dear license holder,

This follow-up to our communication of 11 November 2025 concerns the EU Empowering Consumers (EmpCo) directive.

It includes **important changes to the use of claims alongside the GGN label on packaging**, as set out in the updated GGN label user manual, as well as a change in the **GGN Label License Terms and Conditions**.

Please review this information carefully.

Context and purpose

- The [EU Empowering Consumers \(EmpCo\) directive](#) will apply from **27 September 2026**.
- The dates specified in this communication reflect GGN label governance and contractual requirements. They are independent from, and without prejudice to the legal application date of the EmpCo directive.
- EmpCo introduces clearer and stricter requirements on claims, and applies to all companies supplying products to the EU market.
- The objective is to improve transparency and reduce the risk of misleading consumers.
- Considering the EmpCo directive, we have completed a **legal review of all visual elements** that we allow on product packaging at the point of sale: the GGN label logo, short claims, and long claims.
- The results of this consultation have been integrated to the GGN label user manual based on **our current understanding of EmpCo expectations**, as well as the importance of using clearly specified claim wording that provides consumers with appropriate context.
- This assessment is provided for GGN label governance purposes and does not constitute individual legal advice.

User manual update

- The GGN label and any accompanying claims used on product packaging must be applied exactly as set out in the **updated user manual version 2.0 document**. Please download the updated version from the [GGN label portal](#).
- The user manual version 2.0 publication date is January 2026. **Compliance will be required as of 1 April 2026.**
- Use of a claim alongside the GGN label is optional.
 - **Exception:** For multi-ingredient products, the claim **must** be used in combination with the numbered (1,2,3) ingredient(s), where applicable and in accordance with EU food information requirements, to clearly identify which ingredient(s) have been produced using GLOBALG.A.P. certified production processes. The numbers must be placed directly after the relevant ingredient and link back to the claim, so that it is not interpreted as applying to the entire product.
- If no claim is used, the GGN label may appear on its own.
- If a claim is used, only the **new and updated long claims** will be allowed.
- The official translations of the updated claims, in 30 languages, can also be downloaded from the [GGN label portal](#).
- There are three sector specific versions of the updated long claim – one for each scope:

Agriculture claim



This product comes from a farm that has been independently certified according to international standards that promote responsible farming practices. Learn more about the GGN label and the roots of your product at www.ggn.org.



Aquaculture claim



This product comes from an aquaculture farm that has been independently certified according to international standards that promote responsible farming practices. Learn more about the GGN label and the roots of your product at www.ggn.org.



Floriculture claim



This product comes from a floriculture farm that has been independently certified according to international standards that promote responsible farming practices. Learn more about the GGN label and the roots of your product at www.ggn.org.



- Both claims (short/long) from the previous version 1.0 of the user manual are **no longer permitted**.
- Only the updated claims from version 2.0 will be approved **when a claim is shown on packaging designs submitted from 1 April 2026**.
- Previously approved designs do not need to be resubmitted, unless they are being updated or reissued (e.g., redesign, reprint with changes, or new artwork). In those cases, the updated claim wording must be used. For packaging already in the market, license holders are responsible for determining the appropriate steps and timing to ensure compliance with applicable legal requirements, including EmpCo.

Terms and conditions update

- The GGN Label License Terms and Conditions have also been updated to version 3.1, with the additions as specified below:
 - Clause 3.3: *"Prior to use of packaging materials, the Licensee shall provide the Licensor with pack shots (in an appropriate data format and quality) of each type of packaging including the GGN Label, in order to allow the Licensor to approve the packaging materials for labeling purposes."*

The following clarification has been added to Clause 3.3 for clarification purposes only; the existing wording of Clause 3.3 remains unchanged:

"For the avoidance of doubt, the approval of pack shots and packaging materials pursuant to this section is limited to verifying the correct use of the GGN Label in accordance with the applicable GGN Label Regulations and Sanctions.

Such approval does not constitute and shall not be construed as an assumption of responsibility by the Licensor for compliance of the product, packaging or labelling with applicable laws and regulations. Responsibility for such compliance remains solely with the Licensee, as further reflected in Sections 4.2 and 5.2.3 of the GGN Label Regulations and Sanctions (Annex 4)."

- Clause 6.4 - this clause clarifies the sell-off treatment of labeled products following termination: ***"Labeled products packaged before the effective date of termination may be sold and marketing materials already created may also continue to be used for the purpose of marketing such products."***

Responsibility and compliance

- Compliance with EmpCo is a **legal obligation** for all companies supplying products to the EU market.
- Responsibility for ensuring that on-pack claims comply with applicable laws **rests with the license holder**, irrespective of any approval of claims under the GGN label framework.
- Please be aware that under **section 2.13 of the GGN label terms and conditions (annex 2)**, *"The Licensee undertakes to ensure that all materials used in its advertising and marketing of products that contain the GGN Label comply with all relevant and applicable laws and regulations (including relevant marketing and advertising codes of conduct)..."*
- Agraya GmbH is **not liable for the use of unauthorized claims**. Only claims included in the updated GGN label user manual (version 2.0) are permitted for use going forward, with compliance required by 1 April 2026.
- From 1 April 2026, any new on-pack claims used in connection with the GGN label must follow the updated user manual.

We recognize that the above changes require planning and adjustments. We are fully committed to working with license holders to minimize disruption, support implementation, and comply with the new regulations.

Please refer to the updated user manual with approved claims, and read the comprehensive [EmpCo FAQ provided by the European Commission](#) for more information. Any further questions at this stage may be directed to ggn_info@agraya.com.

Thank you for your cooperation and continued trust.

Kind regards,

Agraya GmbH