

Cologne, 24 February 2026

GGN label update for retailers – EmpCo directive

Dear retailer,

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

It includes information about **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**.
- 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 to **reflect our current understanding of EmpCo expectations**, as well as the importance of using clearly specified claim wording that provides consumers with appropriate context.

User manual update

- Use of a claim alongside the GGN label is optional.
- If no claim is used, the GGN label may appear on its own.
- If a claim is used, it must be applied exactly as set out in the **updated user manual version 2.0 document**. License holders can download it 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**.

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- Both claims (short/long) from the previous version 1.0 of the user manual are **no longer permitted**.
- 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 one addition as specified below:
 - Clause 6.4: *"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."*
 - The following clarification has been added to Clause 3.3 for clarification purposes only; the existing wording of Clause 3.3 remains unchanged:

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."*

"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)."

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.**
- 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.

We recognize that these changes require coordination across the supply chain and are committed to working with partners to support a smooth transition.

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