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**EUROPEAN
TRAVEL
COMMISSION**



NECSTouR
European Regions for
Competitive and Sustainable Tourism



Proof, Not Promises

A Practical Guide to the EU Empowering Consumers Directive for Destinations

APRIL 2026

Executive Summary

A SHIFT FROM NARRATIVE TO EVIDENCE

The [EU Empowering Consumers for the Green Transition Directive](#) (EU) 2024/825 (commonly referred to as EmpCo) introduces a fundamental shift in how environmental claims can be made and communicated.

From 27 September 2026, consumer-facing sustainability claims used in marketing, branding, bidding, and other communications will be subject to significantly increased legal scrutiny. Claims must be clear, specific, substantiated, and non-misleading, supported by verifiable evidence. This applies not only to written statements, but also to labels, visuals and any communication that may imply environmental benefit.

This shift creates a new opportunity. Organisations that can demonstrate credible performance will be better positioned to build trust, differentiate their offer, and strengthen their market position.

For destinations, tourism businesses, and event organisers, sustainability communication becomes a strategic asset. It requires evidence, traceability, and alignment across marketing, operations, and data, but it also enables more confident, compelling, and competitive storytelling.

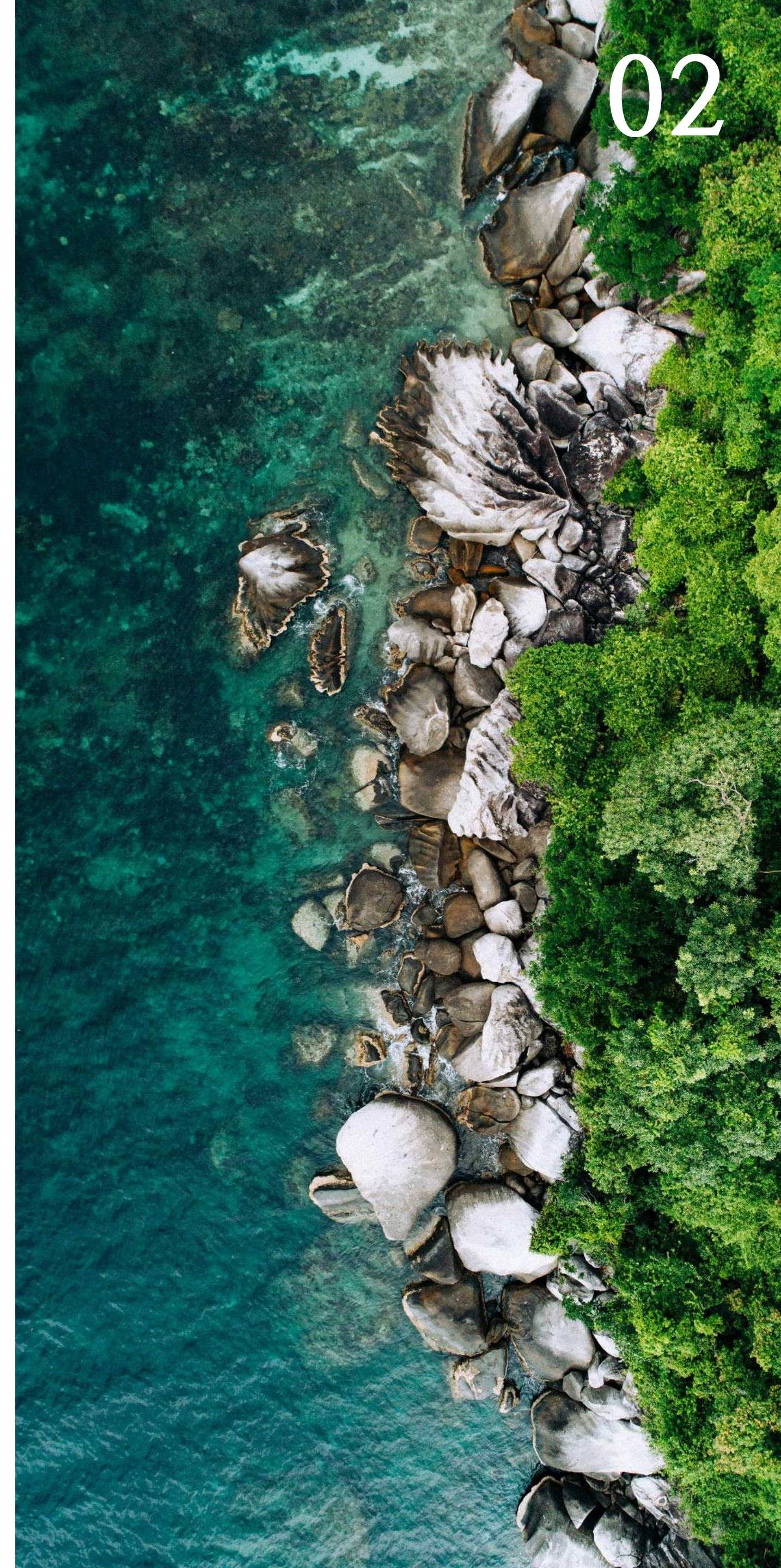
THE OPPORTUNITY BEHIND THE RISK

While the Directive serves to reduce greenwashing, it also raises the bar for meaningful communication.

Organisations that invest in evidence and verification can move beyond generic claims and communicate with clarity and confidence. This builds stronger relationships with visitors, clients, and partners, and supports more resilient long term growth.

At the same time, those that choose not to communicate risk falling into greenhushing. This is rarely a strategy. It is often a signal that systems, evidence, or internal alignment are not yet in place.

The opportunity is not to say less, but to say better.



A COMMON LEGAL FRAMEWORK

While the Directive creates a common legal framework across the EU, implementation is already diverging. Early national transposition across the EU indicates that enforcement approaches, and therefore risk, will vary across markets.

The Directive does not mandate certification, but it significantly raises the standard for credibility, which make the pursuit of certification a wise choice, as, in practice, organisations will increasingly need independently verifiable evidence to support their claims.

WHAT THIS MEANS FOR DESTINATIONS, TOURISM BUSINESSES AND EVENT ORGANISERS

- Claims must move from broad, aspirational language to precise, evidence-based communication
- Credibility is becoming a compliance issue, not just a reputational one
- Marketing, operations, and data must align so that claims reflect actual performance not aspiration
- Organisations must avoid both greenwashing and greenhushing by communicating clearly and with evidence

WHAT CHANGES IN PRACTICE

- Generic claims such as “sustainable” or “eco-friendly” are high-risk unless clearly substantiated
- Climate claims such as “net zero” or “carbon neutral” require clear scope, evidence, and viable plans
- Evidence must exist before claims are made and be available if challenged
- Visual and implied claims may be misleading if unsupported by evidence
- Claims without independent verification carry now carry legal and reputational risk, though certification is not a requirement

WHICH ORGANISATIONS DOES EMPCO APPLY TO?

EmpCo applies to destination management organisations, convention bureaux, venues, event planners, and any organisation making sustainability claims to consumers.

Organisations that invest in evidence, verification, and internal alignment can avoid greenwashing and greenhushing, build credibility, achieve compliance, and compete in an increasingly regulated market.

CLOSING THE CAPABILITY GAP

This shift exposes a structural capability gap across the tourism and events sector, but also a clear opportunity for transformation.

Organisations that develop the right skills, systems, and governance can turn compliance into capability. They can generate robust evidence, align internally, and communicate with precision and confidence.

Those that succeed will not only reduce risk. They will lead the transition to a more transparent, trustworthy, and high performing tourism and events sector.

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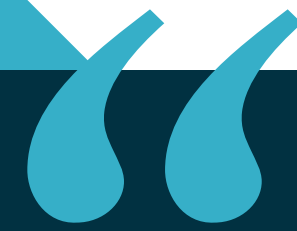
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Foreword by the European Travel Commission

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The EU's Empowering Consumers for the Green Transition Directive is a significant milestone for Europe's tourism industry. While it establishes new standards for how sustainability must be communicated, it also presents a broader opportunity for National Tourism Organisations (NTOs) to lead with clarity, confidence, and purpose.

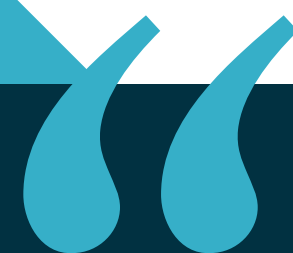
As trust, transparency, and accountability become key to competitiveness, this change encourages NTOs to rethink both their messaging and approaches. Evidence-based, strong communication can foster greater collaboration among destinations, uniting public and private stakeholders behind a shared and credible sustainability effort.

By adopting this shift, NTOs can go beyond disjointed narratives, framing sustainability as a collective effort that demonstrates real progress, enhances partnerships, and resonates more deeply with travellers and local communities. This helps craft destination stories that are not only engaging but also rooted in substance and integrity.

Ultimately, it offers a chance to future-proof Europe's destinations. Those who embrace it will not only comply with new regulations but also shape a more resilient, trusted, and innovative tourism sector for the future.

Teodora Marinko
COO, European Travel Commission

Foreword by the NECSTouR



The adoption of Directive (EU) 2024/825 on Empowering Consumers for the Green Transition (EmpCo) marks a significant shift in how sustainability is communicated and experienced across Europe's single market. By strengthening consumer rights, banning misleading environmental claims, and improving access to reliable information on product durability and reparability, the Directive positions consumers as active agents in the green transition rather than passive recipients of sustainability narratives.

For Europe's tourism destinations, this shift is highly consequential. Tourism is inherently experiential, and destinations/regions, cities and local ecosystems are themselves "products" shaped by public authorities, SMEs and communities. As such, the principles underpinning EmpCo extend beyond retail goods to influence how destinations communicate sustainability, structure visitor experiences, and build trust with increasingly discerning travellers.

From the perspective of NECSTouR, the Network of European Regions for Competitive and Sustainable Tourism, the Directive reinforces a trajectory already embedded in regional practice. Through its Pathway 2030 Strategy, NECSTouR has emphasised the need for a systemic transition towards more resilient, decarbonised and regenerative tourism models. Central to this approach is the recognition that transparency, data and credibility are essential to maintaining trust, both with citizens and visitors. This work is further strengthened by NECSTouR's role as a Partner of the European Climate Pact, through which the network helps bridge EU climate policy objectives with the concrete realities of tourism destinations.

EmpCo directly supports this agenda. For destinations, this implies a move away from aspirational marketing towards evidence-based storytelling grounded in measurable impact. Regions must therefore invest in robust data systems, indicators and verification mechanisms, areas where NECSTouR's Climate and Data Hubs play a critical role.

John Fitzgibbon
Managing Director, NECSTouR

Introduction

The European Green Deal sets the direction for a more climate-neutral, resource-efficient, and resilient European economy. Across tourism and events, that direction is increasingly being translated into regulation, disclosure expectations, and evolving market standards.

This matters because tourism and events are closely tied to environmental, economic, and social impact. The sector supports jobs, local economies, and cultural heritage, but also contributes to emissions, resource misuse, and negative impacts on destinations and communities. As a sector built on the value of places, tourism must adapt to remain compliant, competitive, and aligned with EU policy. The European Commission's Transition Pathway for Tourism reinforces this direction.

A CREDIBILITY GAP IN SUSTAINABILITY CLAIMS

Alongside this broader transition, the EU is addressing a more specific problem: trust in environmental information.

EmpCo responds to a clear market failure. European Commission analysis¹ of environmental claims found that:

- **53%** of claims were vague, misleading or unfounded
- **40%** were unsubstantiated
- Half of environmental labels had weak or no verification.

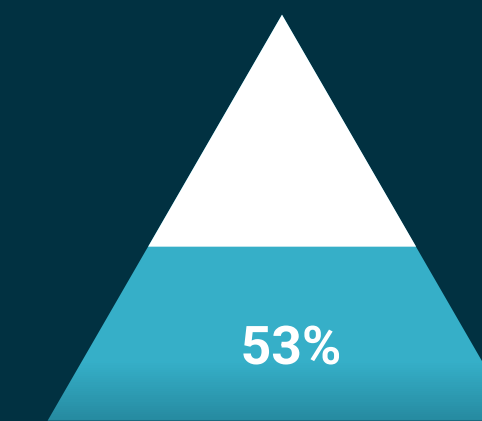
This distorts the market. It allows weak claims to compete with genuine sustainability performance, making it harder for consumers to make informed choices and harder for high-performing organisations to differentiate themselves.

PURPOSE OF THIS GUIDE

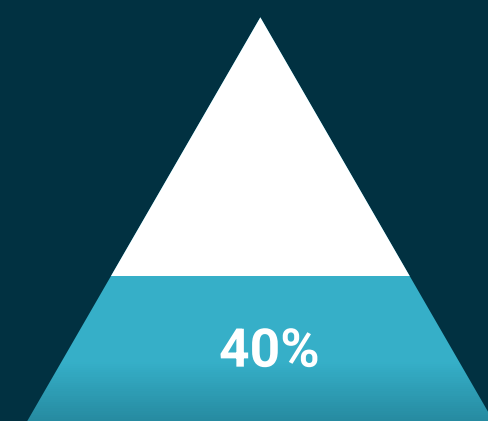
This guide translates the Directive into practical insight for destinations, DMOs, tourism businesses, and event organisers. It explains what the legislation changes, where the main risks lie, and what compliant sustainability communication looks like in practice.

It is based on analysis of the [EU Empowering Consumers for the Green Transition Directive \(EU\) 2024/825](#), and a review of both final and draft national transposition measures across EU Member States. It is not legal advice, but a practical interpretation of what the Directive means for sustainability communication in tourism and events.

Understanding the Directive is the first step; organisations must also build the internal skills, governance, and systems required to apply it consistently across real-world communications.



Claims were vague misleading or unfounded



Claims were unsubstantiated



¹ European Commission (2020), *Environmental claims in the EU: Inventory and reliability assessment*

What is EmpCo?

EmpCo is an EU directive intended to protect consumers from misleading environmental claims and labels.

It strengthens EU consumer protection law to address misleading environmental claims. It amends existing legislation, expanding prohibited practices, and tightening requirements on substantiation and transparency.

Member States were required to transpose the Directive by 27 March 2026, with enforcement from 27 September 2026. There is no transition period once national rules apply, meaning organisations operating in the EU are subject to its penalties from 27 September 2026.

The Directive applies broadly to:


- Goods and services
- Private companies and public bodies
- All consumer-facing communication, including marketing, bids, and promotional materials

Tourism organisations, destinations, and event organisers are all in scope.



How the Directive will be applied in practice

While the Directive sets out legal requirements, enforcement is based on how claims are interpreted by a reasonable consumer and assessed by regulators. Crucially, this means regulators assess the overall impression of a claim, and not just its technical accuracy or wording. In practice, this leads to several key expectations:

REQUIREMENT	WHAT THIS MEANS IN PRACTICE	
	<p>Claims must be clear and not misleading</p>	<p>Claims must be understandable, not open to exaggerated interpretation, and must not create a misleading overall impression for a reasonable consumer</p>
	<p>Claims must be substantiated and verifiable</p>	<p>Evidence must exist before the claim is made and be available if challenged</p>
	<p>Generic environmental claims are restricted</p>	<p>Terms such as “sustainable”, “eco” or “green” cannot be used without clear explanation and supporting evidence</p>
	<p>Future environmental claims must be credible</p>	<p>Claims such as “net zero by 2030” require clear plans, milestones, and supporting evidence</p>
	<p>Scope must be accurate and proportionate</p>	<p>Organisations cannot imply that an entire destination or event is sustainable if only part of it is</p>
	<p>Labels and certifications must be credible</p>	<p>Environmental labels must be transparent, independently verified where relevant, and clear in what they cover</p>
	<p>Visual and implicit claims are in scope</p>	<p>Images, colours, symbols, and branding that suggest environmental benefits may be assessed as claims</p>
	<p>Enforcement powers are strengthened</p>	<p>Authorities can impose fines, require corrective action, and mandate withdrawal of misleading claims</p>

“NET ZERO”, “CARBON NEUTRAL” AND OTHER CLIMATE CLAIMS

While the Directive does not explicitly define terms such as “net zero” (carbon emissions), it directly addresses climate-related claims by restricting those that could mislead consumers; particularly where they rely on carbon offsetting.

For tourism, destinations, and events, this has significant implications.

Claims that an event, organisation, or destination is “net zero”, “carbon neutral”, or “climate positive” are high risk, particularly where:

- Scope 3 emissions (such as travel, accommodation, and supply chains) are significant
- Residual emissions are primarily addressed through offsetting
- The claim is presented as an achieved outcome rather than a future objective
- The scope, boundaries, or methodology are not clearly defined

Claims based primarily on offsetting are particularly exposed to challenge, especially where they imply absolute neutrality or full elimination of impact.

Future commitments (e.g. “net zero by 2030” or “net zero by 2050”) are not prohibited. However, like all environmental claims, they must be:

- Credible and evidence-based
- Clearly framed as targets, not current performance
- Supported by detailed action plans, defined pathways, and measurable milestones

The legal issue is not ambition, but how it is communicated.

What this means in practice

- Avoid absolute claims such as “net zero” or “carbon neutral” unless they can be fully substantiated with verified data across all relevant emissions
- Clearly distinguish between measured emissions, reductions achieved, and any use of offsetting
- Define the scope of the claim (e.g. which emission scopes are included and excluded)
- Frame future targets transparently with supporting evidence and delivery plans
- Ensure that a consumer’s likely understanding of a claim matches its evidence

KEY SHIFT

This marks a clear transition: from headline climate claims to disciplined, transparent, and evidence-based communication. Being prepared can mean the difference between penalties and opportunity.

WHAT THE LAW DOES NOT REQUIRE

The Directive and its national transpositions do not mandate the use of any specific certification scheme, nor do they establish an approved list of labels or standards. They do not require ISO accreditation or other formal certification schemes, and they do not prohibit the use of rankings, indices, or benchmarking tools.

However, the Directive does restrict the use of sustainability labels that are not based on recognised certification schemes with independent verification or established by public authorities, increasing scrutiny on how labels are developed and used.

What the law requires is that any environmental claim is clear, accurate, and can be proven with robust, verifiable evidence.

In practice, this significantly raises the bar for credibility. Organisations increasingly need independently verified data assessed by a third-party body independent of both the scheme owner and the organisation using the label, to support claims and reduce legal risk. This body should operate in line with recognised national, international, or EU standards and procedures.

WHAT IS A GENERIC CLAIM?

The Directive identifies “generic environmental claims” as particularly high risk. These are broad, non-specific statements that suggest or create the impression of positive environmental performance without clear, verifiable substantiation.

Examples include terms such as:

“Environmentally friendly”

“Eco-friendly”

“Green”

“Climate friendly”

“Carbon friendly”

“Biodegradable”

“Biobased”

“Non-toxic”











and similar expressions.

Such claims are prohibited unless they can be substantiated with recognised, verifiable evidence that clearly explains the environmental benefit being claimed.

Importantly, the issue is not only whether a claim is technically accurate, but whether a consumer can clearly understand what is being claimed, how it is supported, and what it means in practice.

High-risk versus credible sustainability claims

The examples below illustrate how common claims can be reframed to reduce risk and increase credibility. They reflect how regulators are likely to interpret claims in practice, based on the principle of overall consumer impression.

SHIFT	HIGH-RISK CLAIM	CREDIBLE CLAIM
From vague to specific	"Our hotel is the most sustainable in the region" 	"Our hotel uses 100% renewable electricity and has reduced water use by 30% since 2021" 
From subjective to objective and verifiable	"Our destination is the most sustainable in the world" 	"Ranked first in the 2025 Global Destination Sustainability Index" 
From headline claims to evidence-based communication	"Our event is net zero" 	"The event's carbon footprint was measured, emissions were reduced by 38%", and remaining emissions were addressed through certified offsetting schemes" 
From self-declared labels to independent verification	"Green Conscious eco-certified hotel" 	"This hotel is certified by EarthCheck which audits it annually" 
From partial action to accurate scope	"Our destination is sustainable" 	"75% of hotels are certified by recognised sustainability schemes, with full destination coverage targeted by 2027" 

KEY TAKEAWAY

- Across all cases, the pattern is consistent:
- Replace broad claims with specific metrics
 - Replace opinion with recognised benchmarks or standards
 - Replace statements with evidence and methodology
 - Replace self-declaration with independent, third-party verification
 - Clearly define scope and avoid over-claiming

Under EmpCo, this shift is not just best practice, it is essential for compliance.

Strategic insight: Same law, different risk models

Although Member States are implementing the same EU Directive, enforcement differs significantly. For organisations operating across markets, compliance risk is shaped less by the wording of the law and more by its enforcement.

This assessment is based on a review of both final adopted laws and draft national legislation available at the time of publication. As transposition progresses, approaches may continue to evolve.

THREE DISTINCT ENFORCEMENT MODELS ARE EMERGING:

1. Litigation-driven risk (i.e. Germany)

Enforcement is driven heavily by competitors and NGOs under unfair competition law.

Risk is highest for comparative, vague, or unsubstantiated claims that can be challenged in court.

2. Proactive regulator risk (i.e. Denmark)

Strong consumer authority with a track record of active enforcement on greenwashing.

Risk comes from regulatory scrutiny, investigations, and corrective orders.

3. Regulator-led compliance risk (i.e. Spain, France, Italy)

Public authorities lead enforcement through administrative processes, fines, and sanctions.

Risk is driven by non-compliance with substantiation, clarity, and transparency requirements.

WHAT IS CONSISTENT ACROSS ALL MARKETS

- Generic environmental claims are high-risk everywhere
- Claims must be specific, substantiated, and verifiable
- Labels and certifications must be legitimate and not misleading
- Tourism and events are fully in scope

IMPLICATION

The Directive is the same, but the risk is not. Organisations must adapt their approach to the enforcement culture of each market, not just the legal text.

What is the Risk?

EmpCo transforms sustainability claims from a communications issue into a source of legal exposure.

ENFORCEMENT IN PRACTICE

Enforcement activity is expected to increase significantly. The cases illustrated show how companies have already been challenged under existing consumer, advertising, and competition laws, and clearly signal the direction for tourism and events. With new national laws implementing the Directive, claims will be increasingly scrutinised and challenged not only when false, but when they are vague, comparative, or insufficiently evidenced.

FINANCIAL AND LEGAL EXPOSURE

Organisations face a combination of regulatory, legal, and commercial risk:

- Potential fines of up to at least 4% of annual turnover under the Directive framework, with national regimes signalling a mix of administrative enforcement, public sanctions, and competitor or NGO challenge
- Orders to withdraw, amend, or substantiate claims
Legal challenges from regulators, competitors, and NGOs
- Increased scrutiny in procurement, partnerships, and funding decisions

STRATEGIC RISK

The primary risk is not limited to financial penalties. Organisations face loss of credibility, forced withdrawal of claims, and exposure to public and competitive challenge.

At the same time, stricter substantiation requirements create a second, less visible risk.

Organisations that lack confidence in their evidence may choose not to communicate at all. This *greenhushing* approach may lower short-term legal risk, but it reduces transparency, weakens stakeholder trust, and limits competitive advantage.

The objective is not to communicate less, but to communicate more precisely. Organisations that invest in evidence, verification, and internal alignment can avoid both greenwashing and greenhushing, maintaining credibility while retaining competitive advantage.

Sustainability communication is now much more than a branding exercise. It is a compliance function with direct legal, commercial, and reputational consequences.

Most tourism organisations were not designed for this reality: sustainability data, legal interpretation and communications typically sit in different teams, creating gaps that increase exposure even where intent is good.

Booking.com (2024)

EU scrutiny of its "Travel Sustainable" label raised concerns around transparency, methodology, and the potential to mislead consumers. It has since transformed its practices to support the Directive (see "How travel platforms are redefining sustainability claims")

KLM (2024)

A Dutch court found elements of its "Fly Responsibly" campaign misleading, particularly where environmental benefits were overstated

Ryanair (2020)

Challenged over claims of being "Europe's lowest emissions airline," where comparisons lacked sufficient substantiation

H&M (2024)

Faced regulatory scrutiny over its "Conscious" collection, particularly around the clarity and credibility of sustainability scoring

What this means for DMOs

Destination Management Organisations (DMOs) face heightened expectations under this legislation, regardless of whether they operate as public bodies, semi-public entities, or private organisations.

Under EU consumer protection law, the key test is not a company's legal status, but its function. An organisation is in scope if it:

- Communicates sustainability claims to visitors or consumers
- Influences consumer choice or purchasing behaviour

In practice, DMOs are clearly within scope when promoting destinations, experiences, events, or services using sustainability-related language. Even brand names may be interpreted as environmental claims if they imply environmental performance, either explicitly or implicitly.

WHY DMOS ARE PARTICULARLY VULNERABLE

DMOs face heightened scrutiny because they are:

- A trusted source of destination information
- Highly visible in sustainability narratives
- Influential in shaping visitor behaviour at scale
- Central to shaping destination reputation

DMOs are not just participants. Their claims can legitimise or amplify those made across the wider visitor economy.

In reverse, one operator's misleading sustainability communication can also weaken the credibility of the destination, creating reputational spillover across the visitor economy.

DESTINATION-LEVEL CLAIMS AND AGGREGATION RISK

Destination-level sustainability claims are particularly high risk because they aggregate multiple independent actors, including hotels, venues, transport providers and suppliers, over which the DMO often has limited direct control.

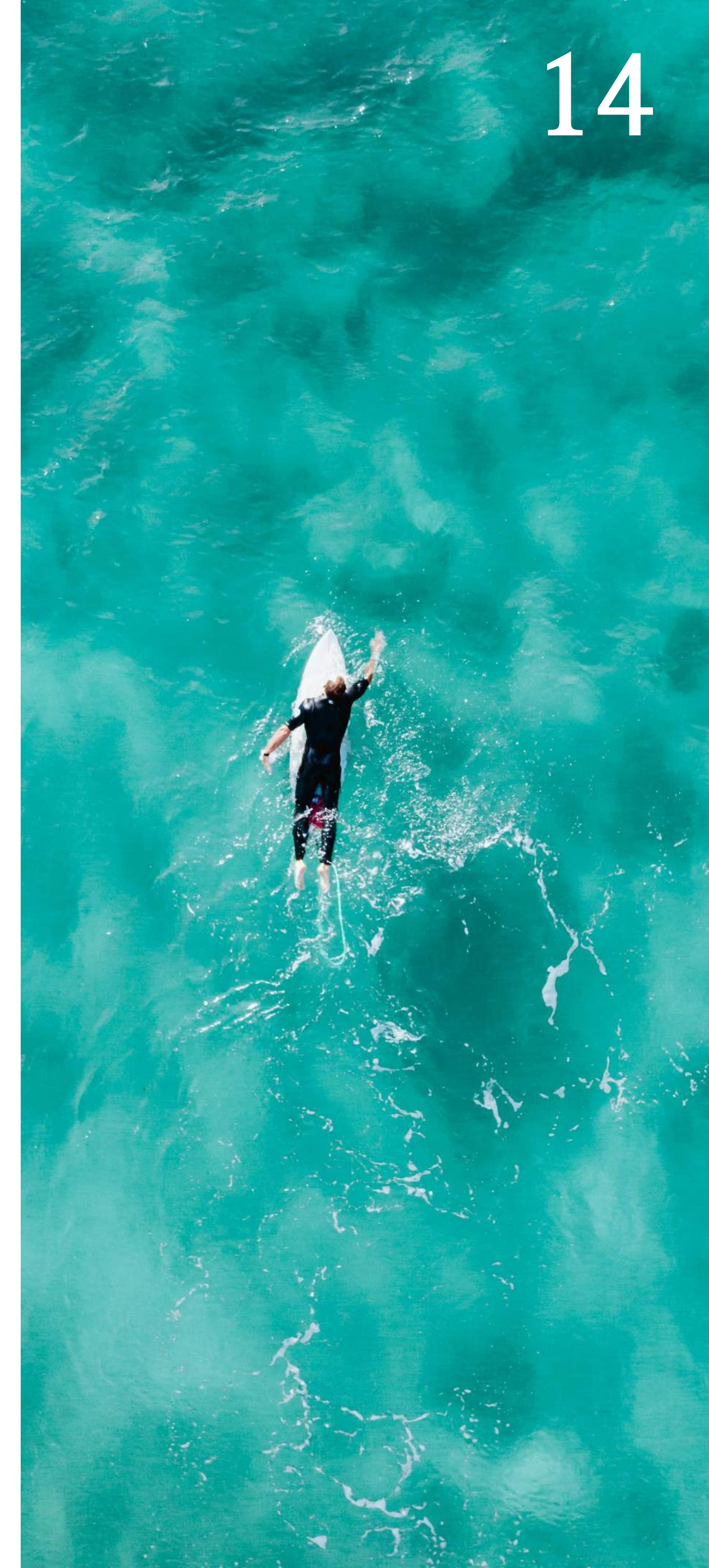
As a result, substantiating claims at destination level requires:

- Reliable, destination-wide data
- Clear definition of scope and boundaries
- Alignment across multiple stakeholders

Without this, there is a risk that partial performance or isolated initiatives are presented as representing the entire destination.

KEY SHIFT

For DMOs, the shift is clear: from destination branding to destination accountability.



Preparing for EmpCo: The 6 Steps to Credible Claims

DMOs should take a structured approach to managing sustainability claims across the destination. The following six steps provide a practical framework for reducing risk and strengthening credibility.

EVALUATE

Understand your exposure and current risk

- Assess how existing and upcoming legislation applies to your organisation
- Map current sustainability claims across marketing, bids, and commercial communications
- Ensure all communication channels and formats are covered, including websites, social media, bid documents, campaigns, printed materials, and merchandise. This should also extend to claims conveyed through visuals, branding, labels, and other non-text elements, not just written statements
- Identify high-risk claims that are vague, unsubstantiated, or unclear

DEFINE

Set clear rules for what can and cannot be said

- Develop a clear compliance approach and internal policy for sustainability claims
- Define acceptable language, with examples of high-risk and compliant claims
- Clearly distinguish between ambition (targets) and performance (verified, measured results)

SUBSTANTIATE

Ensure every claim is backed by proof

- Ground all communications in data, governance frameworks, and accessible evidence
- Use an accredited third-party certification or verification that includes transparent criteria, independent assessment, and ongoing monitoring
- Ensure any labels, rankings, or awards are transparent in scope and meaning

ALIGN

Create consistency across the destination ecosystem

- Establish shared expectations for partners and suppliers
- Ensure claims used in destination marketing reflect what can be evidenced across interested parties
- Avoid destination-wide claims unless supported by destination-wide data.

SUPPORT

Build capability across the system

- Train internal teams on the legal boundaries of sustainability claims
- Support tourism businesses and partners with guidance, tools, and examples
- Facilitate access to certification, funding, and capacity-building initiatives

MONITOR

Continually review and validate claims

- Regularly review and audit communications across the destination
- Ensure all claims remain accurate, up to date, and supported by evidence
- Test claims from a consumer perspective

BEWARE IMPLEMENTATION FRICTION

In practice, most organisations are still building their understanding of the Directive, and this evolving interpretation adds complexity to implementation.

While the steps are conceptually straightforward, delivering them in practice requires coordination across disciplines, consistent decision-making and shared language. These are challenges that many destinations and organisations underestimate.

Responsibility is often split across marketing, sustainability, procurement and legal teams, each with different incentives, skills, language, and risk tolerance. Without facilitation, alignment and governance, even well-intentioned organisations remain exposed.

These six steps may fall flat if internal silos, prevailing political tensions, capacity constraints, data maturity, and conflicting incentives are not included and addressed. In our experience, these steps are best taken with strategic support or a structured programme.

What makes a certification credible?

As the EU strengthens rules on environmental claims through EmpCo, certification schemes are also coming under increased scrutiny.

The Directive does not approve or endorse specific certifications. However, it significantly raises the standard for credibility. In practice, only certification schemes that are robust, transparent, and independently verified are likely to support compliant sustainability claims. For this to be the case, the certification scheme requirements should be developed in consultation with relevant experts and stakeholders.

A SHIFT IN THE CERTIFICATION LANDSCAPE

This scrutiny is accelerating a structural shift in the certification landscape. Some schemes may become increasingly difficult to use in consumer-facing communications, while more rigorous, evidence-based models gain relevance.

For many organisations, credible certification is becoming less a marketing badge and more an operational efficiency providing pre-defined scope, methodology, and independent assurance that reduce the burden of defending claims individually.

A key part of this shift is the growing importance of accreditation. Certification bodies are increasingly expected to operate in line with recognised international standards such as [ISO/IEC 17065](#), with oversight from national accreditation bodies. This provides assurance that certification processes are independent, consistent, and compliant.

INCREASING SCRUTINY

In parallel, the standards underpinning certification schemes are also under greater scrutiny. These are increasingly expected to align with recognised frameworks such as [ISO 14024](#) and, where relevant, [ISO 14025](#), supporting transparency, comparability, and methodological rigour.

This also changes how existing recognition models are interpreted. Tourism and events sector standards may remain relevant, provided they are applied in a way that aligns with the Directive. In the EU context, greater emphasis is placed on certification processes that ensure independent, competent and documented third-party assessment in line with recognised standards and procedures, which may include accreditation where applicable depending on national transposition.

Under EmpCo, the value of certification is not symbolism, it is structure. When employed as an operating system for evidence, it can provide efficiency and protection.

Credible certification provides pre-defined scope, methodologies, verification cycles, and governance, reducing the burden on individual organisations to design and defend claims from scratch. Used wisely, it is more than a badge, it is a time-saving mechanism, a proof infrastructure, a communication enabler, and a risk-transfer mechanism.

KEY CRITERIA FOR CREDIBLE CERTIFICATION

To support compliant claims under EmpCo, certification schemes should demonstrate that:

- The scheme is open to all traders on transparent, fair and non-discriminatory terms, provided they are willing and able to meet its requirements
- The scheme's criteria are developed in consultation with relevant experts and stakeholders
- Clear procedures are in place to address non-compliance, including the suspension or withdrawal of the right to use the label
- Compliance is monitored through an objective process carried out by an independent third party, whose competence and impartiality from the scheme owner and the organisation being assessed are grounded in recognised international, EU, or national standards

Source: Adapted from the [EU Empowering Consumers for the Green Transition Directive \(EU\) 2024/825](#).

WHAT TO WATCH OUT FOR

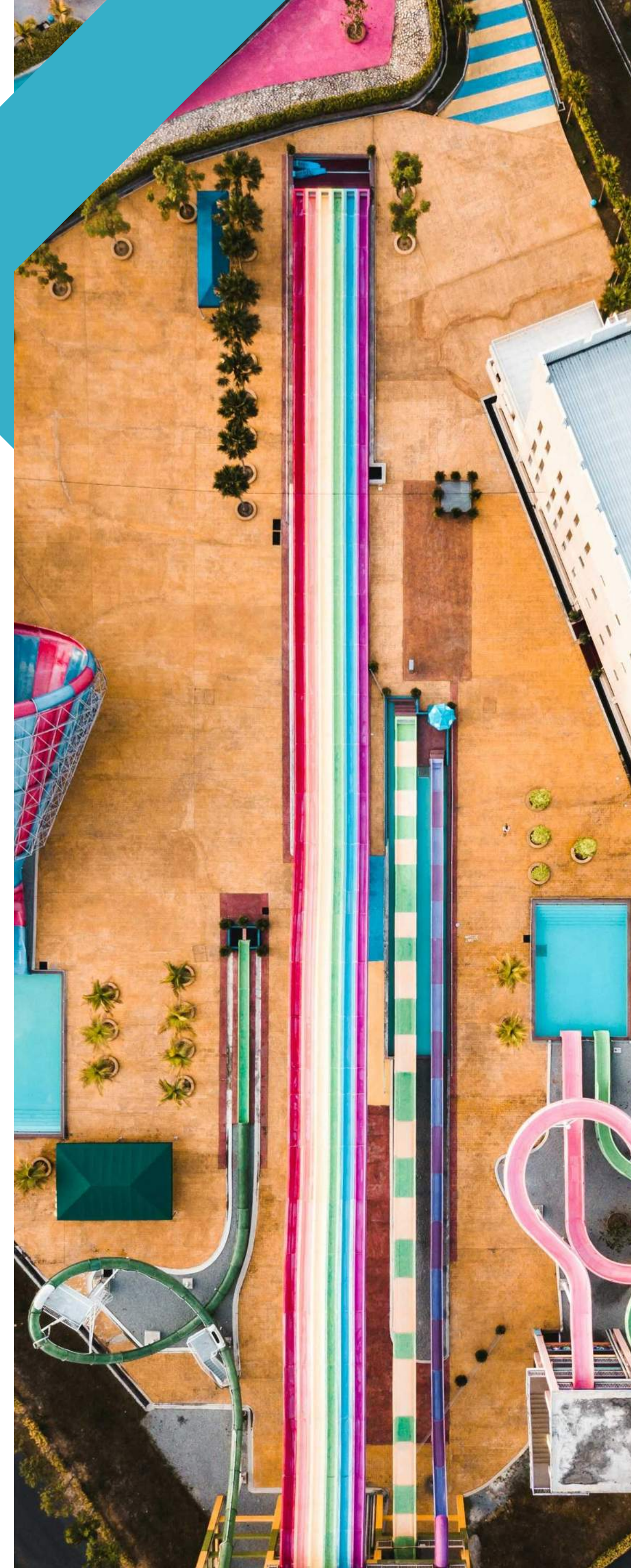
- Self-created labels or badges without independent verification
- Certifications with unclear methodology or limited transparency
- Schemes that imply overall sustainability based on partial criteria
- Labels that may be misunderstood by consumers without explanation

KEY SHIFT

Under EmpCo, certification must function as evidence, not endorsement. Its role is to substantiate claims with clarity, consistency, and independent verification.

Credibility is defined by robustness: clear scope, rigorous methodology and verifiable assurance. Certification schemes and bodies that meet recognised standards can reduce risk and enable confident communication. Certification that does not may increase exposure.

The shift is from selecting labels to selecting proof.



What this means for tourism businesses and event organisers

TOURISM BUSINESSES

- 01 Sustainability claims must be precise, evidence-based, and defensible
- 02 Claims relating to carbon, waste, and circularity must clearly define scope, boundaries, and methodology
- 03 Future commitments (e.g. “net zero by 2030”) must be credible, documented, and supported by clear plans
- 04 Maintain accessible, up-to-date records to ensure evidence can be provided if claims are challenged
- 05 Claims made by partners, suppliers, or venues may create risk where they are repeated, endorsed, or incorporated into an organisation’s own communications



EVENT ORGANISERS AND SUPPLIERS

- 01 Claims such as “low-carbon”, “climate neutral” or “net zero” require careful qualification and clear explanation
- 02 Do not rely on offsetting alone to justify absolute environmental claims
- 03 Bids, proposals, and RFP responses should be subject to the same evidence standards as public-facing communications
- 04 Sustainability claims should reflect measured performance, not ambition or intent
- 05 Review partners, suppliers, and venues to ensure alignment with regulatory expectations and avoid indirect risk

KEY SHIFT

If a claim cannot be proven, it should not be communicated.

How travel platforms are redefining sustainability claims

In parallel with EU legislation, major travel platforms are already enforcing evidence-based sustainability requirements through contractual rules and platform design. Two of the most influential initiatives are Travalyst and Booking.com's Sustainability Programme.

While these initiatives are not regulatory frameworks, they play an increasingly important role in shaping how sustainability information is presented to consumers at scale. They are also closely aligned with the direction of EU consumer protection law, particularly on credibility, transparency, and verification.

Travalyst

Travalyst is a global coalition working to standardise how sustainability information is displayed to travellers. It does not certify businesses or make claims on their behalf. Instead, it defines what credible sustainability information should look like in practice. Through its [certifications initiative](#), Travalyst:

- Publishes a transparent list of certification schemes that declare alignment with EmpCo
- Provides guidance to certification bodies on aligning with emerging regulatory expectations
- Develops data tools and programmes, including its Data Hub, to improve consistency and comparability of sustainability information
- Discourages vague, generic, or unsupported sustainability claims
- Promotes clear, standardised, and evidence-based sustainability indicators.

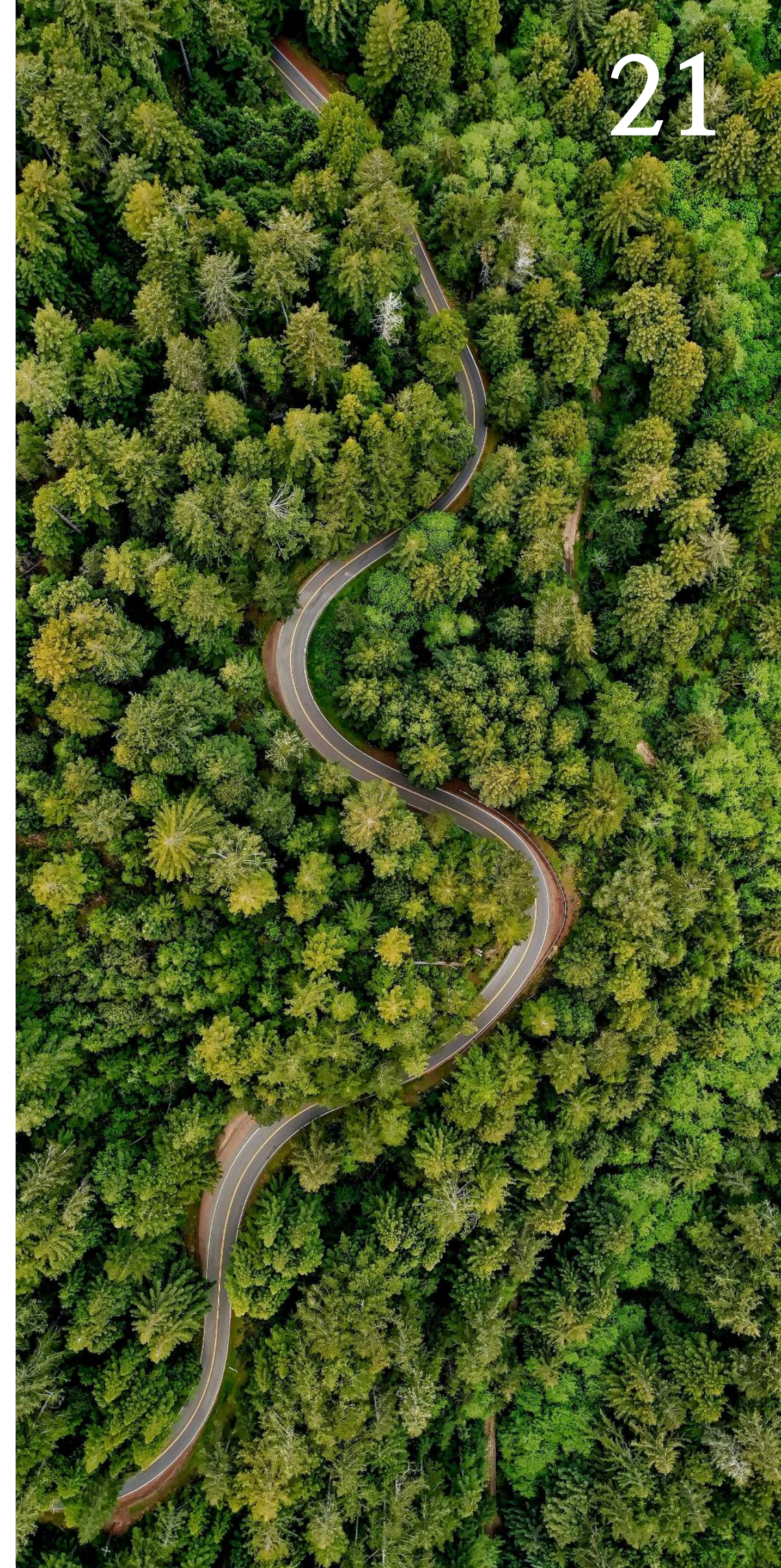
Compliance is enforced indirectly through platform participation. Businesses that do not meet these expectations may lose sustainability visibility but are not subject to legal penalties through Travalyst itself.

Booking.com

Booking.com applies many of these principles at scale through its Sustainability programme since March 2024. The move followed discussions with the [Netherlands Authority for Consumers and Markets \(ACM\)](#), which flagged that the previous self-reporting system could be misleading under new consumer protection standards. The changes transformed it into an example of compliance². Properties can display sustainability information where they hold recognised third-party certification and meet ongoing verification requirements. This enables travellers to filter for "sustainability certified" options, increasing the visibility of verified properties.

Importantly, Booking.com does not label properties as "sustainable" in absolute terms, avoids outcome-based claims such as "low carbon" or "net zero", and uses conservative, evidence-linked language. Compliance is enforced contractually through the platform, primarily affecting visibility rather than legal status.

² <https://partner.booking.com/en-us/help/property-page/general-info/sustainability-program-evolution-faqs#question-25024>



IMPLICATIONS FOR DESTINATIONS, DMOS, AND TOURISM ORGANISATIONS

- Platform-level sustainability recognition does not justify destination-wide claims
- Labels or badges apply at property or service level, not to destinations as a whole
- Reusing platform language in destination marketing requires careful qualification and alignment with underlying evidence

Organisations already aligned with Travalyst or Booking.com requirements are generally well positioned for regulatory compliance. These requirements aim to improve the clarity and consistency of sustainability information, support more transparent communication and guide organisations towards independently verified certifications.

KEY SHIFT

Platform rules are pre-aligning the market with regulation by setting expectations before enforcement begins. For tourism organisations, compliance has gone beyond being a legal issue to become a visibility and competitiveness opportunity. Destinations that seize the moment now are better placed to stay ahead of competition and potentially lead it.

Conclusion

EmpCo represents a structural shift for tourism and events across Europe. It does not limit sustainability ambition. It redefines how that ambition is expressed, evidenced, and trusted.

FROM PROMISES TO PROOF

At its core, this is a shift from promises to proof. Sustainability is moving from broad, aspirational language to precise, substantiated, and verifiable communication. Claims will increasingly be judged not by intent, but by evidence and how they are understood by consumers.

This shift is designed to address greenwashing, but it also introduces a parallel risk of *greenhushing*, when organisations that lack confidence in their evidence may choose not to communicate at all. The challenge is not to say less, but to communicate with clarity, discipline, and confidence.

For those that get this right, the opportunity is significant. Clear, evidence-based communication builds trust faster, strengthens brand credibility, and creates meaningful differentiation in a crowded market.

FROM MARKETING TO CREDIBILITY SYSTEMS

Sustainability communication has evolved beyond its traditional role as a marketing function. It now sits at the intersection of compliance, data, and governance.

This elevates the importance of internal alignment. Marketing, operations, and reporting must work together to ensure that claims reflect actual performance and can be substantiated if challenged. Organisations that adapt early will not only reduce risk, but strengthen trust, partnership readiness, and long-term competitiveness.

As a result, organisations will increasingly need structured support (including training, facilitation, tools and compliant assurance mechanisms) to move from ambition to confident compliant communication.

Most communication professionals have not been trained to translate regulatory, data-heavy sustainability evidence into consumer-facing language that is accurate, compliant, and engaging. EmpCo establishes a new professional reality for which training is essential.

A TRANSFORMATION ALREADY UNDERWAY

The Directive does not mandate certification, but it raises the bar for what constitutes acceptable evidence. This is accelerating a broader transformation in certification systems, data frameworks, and platform requirements.

Schemes that lack transparency, independent verification, or alignment with recognised standards will become less efficient to use. At the same time, more rigorous, evidence-based and accredited models are gaining relevance as certification shifts from a marketing signal to a practical mechanism for generating and validating proof.

This creates a clearer landscape where credible performers can stand out with confidence.

LOOKING AHEAD

The future of sustainability in tourism is not to make louder promises but to provide clearer proof. Sustainability is moving from aspiration to accountability, and with that comes a shift in how leadership is defined.

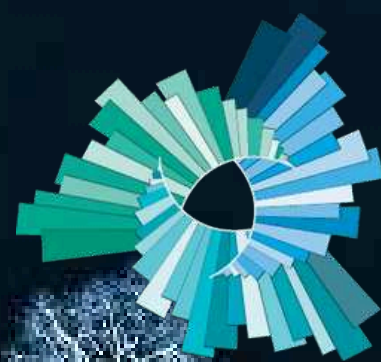
From my perspective, this shift is both necessary and overdue. It creates the conditions for a more transparent, trusted, and ultimately more competitive tourism sector.

Those who respond by strengthening evidence, alignment, and communication discipline will not only comply with regulation but unlock new value. They will build stronger relationships, compete more effectively, and help shape what credible, future-fit tourism looks like.

Demonstrating credibility is no longer just about compliance. It is a powerful way to lead.

Guy Bigwood

CEO, GDS-Movement™



How the GDS–Movement Can Support You

The GDS–Movement supports destinations, tourism organisations, and event organisers in strengthening the evidence, governance and communication practices required by EmpCo. The focus is on helping organisations move from sustainability ambition to clear, substantiated, and compliant claims.

CHOOSING THE RIGHT NEXT STEP

EmpCo compliance will not be achieved through better wording alone. It requires new skills, new governance, and reliable systems that most tourism organisations do not yet have in place. Whatever stage your organisation is at, your EmpCo readiness needs the right response.

- **Early-stage / Comms-led risk** → Take the Destination Storytelling Masterclass
- **Complex, multi-stakeholder exposure** → Get hands-on help from GDS-Consulting
- **Claim-heavy, repeat communications** → Invest in the GDS-Pathway to Certification

GDS-ACADEMY

The Destination Storytelling Masterclass has been developed and implemented with destinations and DMOs globally. It focuses on how to communicate sustainability in ways that are engaging and compliant.

Using real-world examples and practical frameworks, the programme explores how destinations and organisations can integrate sustainability into their communications while avoiding common risks such as greenwashing and *greenhushing*.

It also provides an overview of the evolving regulatory landscape, alongside behaviour change approaches, and storytelling tools that support more effective communication.

Participants develop practical skills to strengthen how sustainability is communicated across their organisation and destination. More information: <https://www.gds.earth/academy/>

GDS-CONSULTING

GDS-Consulting supports destinations and organisations in translating regulatory requirements into practical implementation.

This includes reviewing and refining sustainability claims, developing governance frameworks, and implementing sustainability management systems that enable consistent data collection, reporting, and communication.

Through workshops, training and facilitated collaboration, GDS-Movement helps build internal capability and align interested parties across the destination. The aim is to create the structures needed to support accurate, transparent, and defensible sustainability communication.

THE GDS-PATHWAY TO CERTIFICATION

The GDS-Pathway to Certification gives destination management organisations a clear, structured route to move from benchmarking to independent certification aligned with the Global Sustainable Tourism Council (GSTC) Destination Standard.

Built on the successful GDS-Index, it supports DMOs from initial engagement to development of a robust Sustainable Management System (SMS) and onward to certification readiness. The pathway is designed around shared indicators, clear methodologies, and one integrated digital platform.

By reusing existing data as certification evidence, reducing duplication across frameworks and reporting, and providing a guided pathway, it accelerates time to audit and certification while lowering cost and effort.

For more information, visit www.gds.earth/destination-consulting/ or email info@gds.earth