



Regenerative
Organic Alliance

EU COMPLIANCE BRIEF

DIRECTIVE (EU) 2024/825 · EMPCO

How Regenerative Organic Certified® Supports Compliance with the EU EmpCo Directive

Regenerative Organic Alliance | Updated September 2026



27 Sept 2026

LABEL PROVISIONS APPLY

15

ROA-APPROVED CBS WORLDWIDE

3 Pillars

BRONZE · SILVER · GOLD

OVERVIEW

A new standard for environmental claims in the EU

The European Union's Empowering Consumers for the Green Transition Directive (EU) 2024/825 ("EmpCo") amends the Unfair Commercial Practices Directive (2005/29/EC) and the Consumer Rights Directive (2011/83/EU) to establish new requirements for environmental claims and sustainability labels communicated to consumers in the European Union.

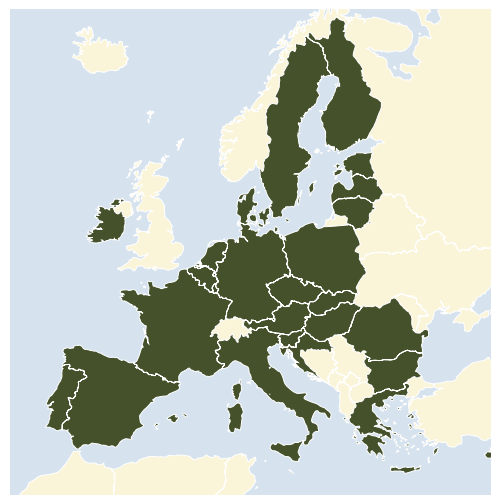
EU Member States must transpose EmpCo into national law by 27 March 2026, and its provisions on sustainability labels and related unfair commercial practices apply from **27 September 2026**.

EmpCo applies to any business — including businesses established outside the EU — that makes environmental or sustainability claims to consumers in the EU.

EmpCo establishes requirements both (a) for traders and certified entities that use sustainability labels and environmental claims, and (b) for the certification schemes that underlie those sustainability labels.

Regenerative Organic Certified® is a certification program administered by the Regenerative Organic Alliance ("ROA"). ROA is the scheme owner: it develops and maintains the Regenerative Organic Certified® Framework and associated program requirements (collectively, the "ROC™ Framework"), while certification decisions are made independently by ROA-approved, third-party Certification Bodies ("CBs"). This scheme-owner / independent-certifier structure is the model EmpCo expects of a credible sustainability certification scheme.

Regenerative Organic Certified® certification is granted at the farm or operation level, to entities that meet the applicable requirements across one or more of the program's three pillars — Soil Health & Land Management, Farmer & Worker Fairness, and Animal Welfare — at the Bronze, Silver, or Gold level. A farm or operation holding a current certificate is referred to as a "Certified Producer," and agricultural material sourced from a Certified Producer's certified scope is a "Certified Product." Product, ingredients, and brand-level claims about Regenerative Organic Certified® status must trace back to a Certified Producer and must be used under a valid license from Regenerative Organic Alliance.



WHERE EMPCO APPLIES

Any business — including businesses established outside the EU — that makes environmental or sustainability claims to consumers in the EU.

■ EU Member States

27 Mar 2026

TRANSPPOSITION

DEADLINE

27 Sep 2026

LABEL PROVISIONS

APPLY



BRONZE



SILVER



GOLD

“

Certification of a farm, operation, or product does not automatically substantiate every environmental, climate, or comparative claim a brand may choose to make.

Brands remain responsible for ensuring that their own consumer-facing claims are accurate, specific, appropriately qualified, and supported by evidence, consistent with EmpCo's requirements for traders.

The sections below summarize how the Regenerative Organic Certified® program's structure and governance align with EmpCo's principal requirements, followed by at-a-glance reference tables and answers to frequently asked questions.

ALIGNMENT

How Regenerative Organic Certified® Supports the EmpCo Requirements

1

Publicly Available Scheme Requirements

EMPCO REQUIREMENT

Sustainability labels must be based on a certification scheme whose requirements are publicly available.

ROA publishes the core Regenerative Organic Certified® program documents on RegenOrganic.org/resources, including the Regenerative Organic Certified® Framework, the Operations Manual for Certification Bodies, the Labeling Guidelines & Terms of Use, Licensee Agreements, and the current list of ROA-approved Certification Bodies. These documents set out the certification criteria, the certification process, and the terms under which the Regenerative Organic Certified® Marks may be used.

2

Open, Transparent, and Non-Discriminatory Access**EMPCO REQUIREMENT**

Certification schemes should be open to applicants on a transparent, non-discriminatory basis.

Any eligible farm or operation that meets the applicable Regenerative Organic Certified® Framework criteria may apply for certification through any ROA-approved Certification Body operating in its region. As of August 2026, ROA has approved 15 independent Certification Bodies operating across North America, Latin America, Europe, Africa, Asia, and Oceania. Several of these CBs — including Ecocert Environnement, Control Union, the Istituto per la Certificazione Etica e Ambientale (ICEA) and others — are approved to certify across all EU Member States, giving EU-based operations a choice of independent certifier.

3

Requirements Developed Through Expert and Stakeholder Consultation**EMPCO REQUIREMENT**

Scheme requirements should be developed by the scheme owner in consultation with relevant experts and stakeholders.

The Regenerative Organic Certified® Framework has been developed through an ongoing, expert-driven process since ROA's founding in 2017. A 2019 pilot program tested the draft standard with 19 farms and brands across a range of commodities and geographies; participant feedback from that pilot, together with input from specialized task forces and advisory boards, informed a major Framework revision in June 2020.

The ROA carries out framework revisions at least once every five years, with interim revisions as needed by drawing on defined stakeholder groups, including farmers, ranchers; auditors; social and animal welfare non-governmental organizations; veterinarians with farm-animal expertise; environmental non-governmental organizations; certification and standard experts; and retailers, food companies, and brands. Pillar-specific technical bodies, such as the External Review Subcommittee for the ROC™ Soil Health and Land Management pillar, provide additional subject-matter expert reviews for their respective pillars. ROA's founding organizations and current Board-represented companies span the certification, retail, agriculture, and conservation sectors, including Dr. Bronner, Patagonia, Rodale Institute, among others.

4

Certification Delivered Independently, Not by ROA Itself**EMPCO REQUIREMENT**

Certification should be carried out by an independent, competent third party — not by the scheme owner.

ROA does not certify operations directly. Certification decisions — including audits, certification renewals, suspensions, or withdrawals — are made independently by ROA-approved Certification Bodies under the requirements of the ROC™ Operations Manual for Certification Bodies. ROA's role is limited to (1) setting program requirements and (2) approving, training, and overseeing the CBs that perform certification.

5

Competence and Independence of Certification Bodies and Personnel

EMPCO REQUIREMENT

Certification bodies and their personnel must be competent and independent, evaluated against recognized standards.

ROA-approved Certification Bodies must hold current accreditation under the USDA National Organic Program (NOP) (7 CFR § 205.501), and the Operations Manual for Certification Bodies incorporates requirements consistent with ISO/IEC 17065:2012 (Conformity assessment — requirements for bodies certifying products, processes and services) and ISO/IEC 19011:2011 (Guidelines for auditing management systems).

Individual auditors must also be approved before conducting Regenerative Organic Certified® audits. To obtain approval, a CB submits each candidate auditor's qualifications, training records, and conflict-of-interest disclosures to the ROA for review; the auditor then completes Regenerative Organic Certified® specific training and passes pillar-specific examinations before the ROA records the auditor as approved and issues a formal letter of approval.

6

Ongoing Monitoring

EMPCO REQUIREMENT

Certified entities and the certification bodies themselves must be subject to ongoing, objective monitoring.

Monitoring operates at two levels. Certification Bodies conduct annual surveillance audits of certified operations and may conduct unannounced or complaint-triggered audits. ROA, in turn, monitors the Certification Bodies through application and document review, organizational capability assessment, personnel evaluation, office evaluations, file reviews, corrective action tracking, witness audits, and periodic renewal evaluations.

7

Enforcement and Corrective Measures

EMPCO REQUIREMENT

The scheme must provide effective procedures to address non-compliance, including suspension or withdrawal.

Certification Bodies apply documented procedures for non-conformities, warnings, suspension, and withdrawal of certification for individual operations. Separately, ROA may suspend or cancel the approval of a Certification Body itself — on a temporary basis (suspension, affecting one or more pillars) or permanently (cancellation) — based on its own oversight findings. Complaints regarding a certified operation, a Certification Body, or use of the Regenerative Organic Certified® Marks must be submitted to ROA for review through the online Complaint Form, and are reviewed by the ROA Quality Assurance Team.

8

Objective, Documented Certification Decisions

EMPCO REQUIREMENT

Certification decisions must be objective, evidence-based, and documented.

Certification Bodies issue certification decisions based on documented audit findings against the Regenerative Organic Certified® Framework criteria, and maintain audit records supporting each certification decision. ROA makes final approval, suspension, and cancellation decisions concerning Certification Bodies, with two QA members and one member of ROA's leadership team.

9

Control of the Regenerative Organic Certified® Mark and Claims

EMPCO REQUIREMENT

The scheme owner must control use of its certification marks and prevent claims that overstate or misuse the certification.

Use of the Regenerative Organic Certified® name, certification marks, seals, and logos (collectively, the “Regenerative Organic Certified® Marks”) is governed by ROA's Labeling Guidelines & Terms of Use. Only Certified Producers and licensees with an approved ROA license agreement may use the Regenerative Organic Certified® Marks, and only within the scope of their certification. Brands and other licensees must submit labels, packaging artwork, and other marketing materials bearing the Regenerative Organic Certified® Marks to ROA for review and written approval before printing or use. The Guidelines expressly distinguish a properly scoped certification claim (“Regenerative Organic Certified®”) from broader, unsubstantiated marketing claims — such as “best for the climate,” “carbon neutral,” or “lowest environmental impact” — which are not certified claims and remain the claimant's own responsibility to substantiate.

QUICK REFERENCE

EmpCo Requirements at a Glance

TABLE 1 For Certified Entities (Traders)

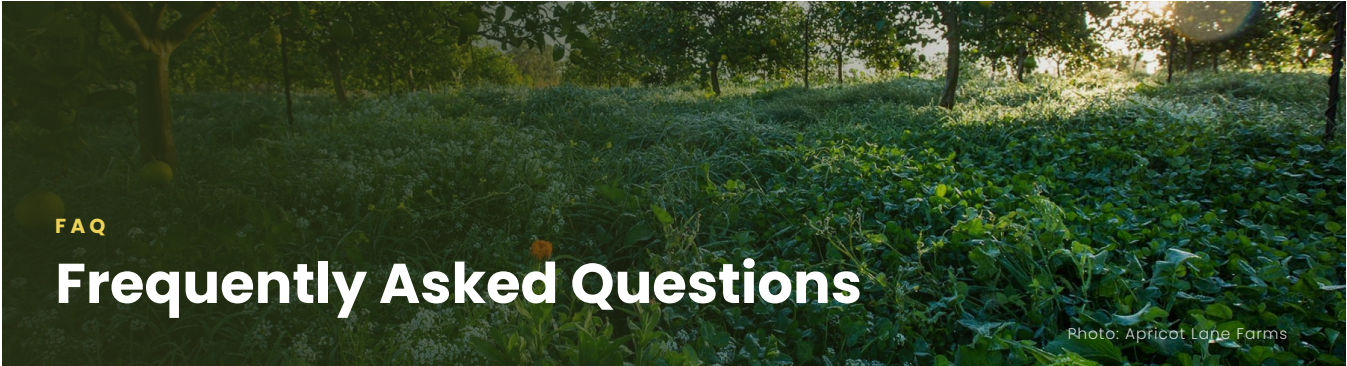
EMPCO PRINCIPLE	HOW THE REGENERATIVE ORGANIC ALLIANCE ADDRESSES IT
Claims must be truthful and not misleading	A properly scoped “Regenerative Organic Certified®” claim reflects an independently audited certification status; the Labeling Guidelines prohibit misleading use of the Marks.

EMPCO PRINCIPLE	HOW THE REGENERATIVE ORGANIC ALLIANCE ADDRESSES IT
Environmental claims must be substantiated	Certification decisions rest on documented audit evidence against the published Regenerative Organic Certified® Framework criteria.
Sustainability labels must be based on an approved certification scheme	Regenerative Organic Certified® is administered by ROA as scheme owner, with certification performed by independent, ROA-approved Certification Bodies.
The scope of the sustainability label must be clear	Certification is scoped to a specific farm/operation, pillar(s) (Soil Health, Farmer & Worker Fairness, Animal Welfare), and level (Bronze, Silver, or Gold).
Claims should not extend beyond the evidence or certified scope	Licensees must limit claims to their certified scope; broader marketing claims (e.g., “carbon neutral”) are not covered by certification and remain the brand's responsibility.
Comparative or outcome-based claims require specific evidence	The Labeling Guidelines distinguish the certified claim from comparative or superiority claims, which the Marks do not substantiate on their own.
Use of sustainability labels must comply with applicable rules	Use of the Regenerative Organic Certified® Marks requires a valid license agreement and, for licensees, ROA's prior written approval of labels and marketing materials before printing or use.
Responsibility remains with the trader making the claim	The Labeling Guidelines make clear that Certified Producers and licensees are responsible for the accuracy of their own consumer-facing claims.

TABLE 2 For Certification Schemes

EMPCO PRINCIPLE	HOW THE REGENERATIVE ORGANIC ALLIANCE ADDRESSES IT
Publicly available scheme requirements	Framework, Operations Manual, Labeling Guidelines, and approved-CB list are published at RegenOrganic.org/resources .
Open, transparent, non-discriminatory access	Any eligible operation may apply through the ROA website and work with any ROA-approved Certification Body serving its region; 15 CBs are approved worldwide, including several covering all EU Member States.
Requirements developed with relevant stakeholders	Framework and pillar guidance are developed and revised regularly with input from technical experts, farmers, and program stakeholders.
Independent third-party monitoring	Certification decisions and audits are performed by independent Certification Bodies, not by ROA.
Competence and independence of certification personnel	CBs must hold USDA NOP accreditation; the Operations Manual for CBs incorporates ISO/IEC 17065:2012 and ISO/IEC 19011:2011 principles; individual auditors are separately vetted and approved by ROA.

EMPCO PRINCIPLE	HOW THE REGENERATIVE ORGANIC ALLIANCE ADDRESSES IT
Ongoing monitoring	CBs conduct annual (and unannounced/complaint-triggered) surveillance audits of operations; ROA separately monitors CB performance on an ongoing basis.
Procedures for non-compliance	CBs apply documented non-conformity, suspension, and withdrawal procedures for operations; ROA may suspend or cancel a CB's own approval.
Objective certification decisions	Certification decisions are evidence-based and documented by independent CBs and auditors; CB approval/suspension/cancellation decisions are made by the ROA.
Oversight of the certification bodies	ROA evaluates and monitors CBs through document review, capability and personnel assessment, file reviews, corrective actions, and witness audits.
Control of certification marks and claims	Use of the Regenerative Organic Certified® Marks requires a license agreement and ROA's prior written approval of labels and marketing materials before use.



Q Does EmpCo make certification mandatory for all environmental claims?

Not generally. EmpCo does not require every environmental claim to be certified. However, it prohibits sustainability labels that are not based on a certification scheme or that have not been established by public authorities, and it imposes substantiation, clarity, and evidence requirements on environmental claims generally — certified or not.

Q Can Regenerative Organic Certified® support an EU brand's compliance under EmpCo?

Yes. Regenerative Organic Certified® certification can provide independently verified, documented support for a properly scoped certification based on clear criteria, provided the applicable ROC™ certification, licensing, and labeling requirements have been met. ROC™ is based on defined requirements and third-party certification. ROA's certification-body requirements incorporate relevant international conformity-assessment standards, including ISO/IEC 17065, and require certification bodies to evaluate operations against the ROC Framework and monitor continued adherence to the ROC program. However, ROC certification does not, by itself, establish compliance with EmpCo or substantiate every environmental, climate, biodiversity, or comparative claim a brand may wish to make. Brands remain responsible for ensuring that each claim is accurate, specific, appropriately substantiated, and compliant with applicable EU and national requirements.

Q Does EmpCo require the certification scheme to be accredited under EU Regulation (EC) No 765/2008?

For certification schemes established within the EU, EmpCo and related EU rules generally expect certification bodies to be accredited under the Regulation (EC) No 765/2008 framework or an equivalent recognized system. Regenerative Organic Certified's Certification Bodies are accredited under the USDA National Organic Program (NOP), and the ROC™ Operations Manual for Certification Bodies incorporates requirements consistent with the same international standards (ISO/IEC 17065:2012 and ISO/IEC 19011:2011) that underlie the EU accreditation framework. ROA is monitoring EU Member State transposition of EmpCo and the accreditation and equivalence pathways available as the rules take effect, to confirm ongoing alignment for CBs operating in the EU.

Q Are Regenerative Organic Certified® Certification Bodies independent from ROA?

Yes. Certification Bodies are independent organizations, separately accredited under the USDA NOP, and approved by ROA to perform Regenerative Organic Certified® audits and certification decisions. ROA does not certify operations itself.

Q Does ROA monitor the Certification Bodies that perform certification?

Yes. ROA evaluates and monitors approved Certification Bodies on an ongoing basis, including through application and document review, organizational capability assessment, personnel evaluation, office evaluations, file reviews, corrective action tracking, witness audits, and periodic renewal evaluations. The CB approval is formed by two QA and one ROA leadership members — who make final decisions on CB approval, suspension, and cancellation.

Q Does the Regenerative Organic Certified® program have procedures for suspension, cancellation, or withdrawal?

Yes. Certification Bodies apply documented procedures to suspend or withdraw an individual operation's certification. Separately, ROA may suspend or cancel a Certification Body's own approval to perform Regenerative Organic Certified® audits.

Q What certification levels exist under the Regenerative Organic Certified® program?

Regenerative Organic Certified® is awarded at the Bronze, Silver, or Gold level, across one or more of three pillars: Soil Health & Land Management, Farmer & Worker Fairness, and Animal Welfare. A claim should identify the certified scope (pillar(s) and level) rather than imply blanket certification across all pillars at the highest level.

Q Does Regenerative Organic Certified® certification automatically cover climate or other environmental claims?

No. Certification confirms conformity with the applicable Regenerative Organic Certified® Framework criteria within the certified scope. It does not automatically substantiate separate claims such as “carbon neutral,” “best for the climate,” or “lowest environmental impact.” A brand making such additional claims must independently support them.

Q What should a brand do when communicating Regenerative Organic Certified® certification in the EU?

- ✓ Confirm current certification status and scope (pillar(s) and level) with the relevant ROC™ Certified Producer or ROA before making a claim.
- ✓ Use the complete phrase “Regenerative Organic Certified®” together with the registered trademark symbol “®” for all claims made in the EU (as well as the US, UK, and Japan), rather than the acronym “ROC™” alone.
- ✓ Hold a valid ROA license agreement (or be a Certified Producer) before using the Regenerative Organic Certified® Marks on any label, packaging, or marketing material.
- ✓ Submit labels, packaging artwork, and marketing materials bearing the Regenerative Organic Certified® Marks to ROA for review and written approval before printing or use.
- ✓ Keep claims within the certified scope — do not extend a claim to products, facilities, or acreage that are not part of the certified operation.
- ✓ Separately substantiate any additional environmental, climate, or comparative claims not covered by the certification itself.
- ✓ Direct questions about claim wording or documentation to ROA in advance of publication.



LEARN MORE

Supporting Resources

- ◆ Directive (EU) 2024/825 (“EmpCo”) — official text
- ◆ Regulation (EC) No 765/2008 — EU accreditation and market surveillance framework
- ◆ Directive 2005/29/EC — Unfair Commercial Practices Directive
- ◆ Directive 2011/83/EU — Consumer Rights Directive
- ◆ European Commission — Green Claims & Circular Economy
- ◆ Regenerative Organic Certified® Framework, Operations Manual for Certification Bodies, Labeling Guidelines & Terms of Use, and list of ROA-Approved Certification Bodies — available at regenorganic.org/resources

GET IN TOUCH

Questions

Talk to the Regenerative Organic Alliance before you publish. We're here to help brands communicate Regenerative Organic Certified® clearly and compliantly in the EU.

CLAIMS & LABEL REVIEW

About claim wording or documentation, or to submit labels, packaging, or marketing materials bearing the Regenerative Organic Certified® Marks for review, contact ROA at label@regenorganic.org

MARKETING & COMMUNICATIONS

For marketing and communication inquiries, contact Darcey@regenorganic.org

COMPLAINTS

To submit a complaint regarding a certified operation, a Certification Body, or use of the Regenerative Organic Certified® Marks, use the online Complaint Form at RegenOrganic.org

ABOUT THIS DOCUMENT

For questions about this document, contact Paul@regenorganic.org

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Nourish Your Life.*

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