



**WHEN IT LOOKS
GREEN; SMELLS
GREEN; EVEN TASTES
GREEN; IS IT REALLY
GREEN?**

**EU EMPOWERING
CONSUMERS
DIRECTIVE & GREEN
CLAIMS DIRECTIVE IN
TOURISM**

Promoting sustainable travel and safeguarding consumer rights

By Peter Henkes

INTRODUCTION



EMPOWERING CONSUMERS & GREEN CLAIMS

EU Directives Overview

The Empowering Consumers and Green Claims Directives are both part of the Green Deal and ensure transparency and accountability in sustainability claims.

Tourism Industry Impact

These directives guide tourism businesses in making truthful sustainability claims and avoiding greenwashing.

Certification and Compliance

Certification bodies and auditors play a key role in verifying claims and ensuring compliance with standards.

Avoiding Misleading Claims

Practical guidance helps businesses identify and avoid misleading sustainability claims to maintain consumer trust.

UNDERSTANDING THE DIRECTIVES



WHAT IS THE EU EMPOWERING CONSUMERS DIRECTIVE (2024/825)?

Consumer Protection Enhancement

The directive ensures that claims (not only sustainability) are clear, accurate, and verified by an independent third party, thereby protecting consumers from misleading information.

Transparency in Marketing

Businesses must disclose the basis of their sustainability claims, promoting transparency and trust in sustainability marketing.

Implications for Tourism Sector

Travel agencies, hotels, cruise lines and tour operators, excursion providers, etc must present accurate (sustainability) credentials to maintain consumer trust and avoid penalties.

This directive must be transposed into national law by 27 March 2026 and enforced from 27 September 2026 onwards.

WHAT IS THE EU GREEN CLAIMS DIRECTIVE?

STILL UNDER NEGOTIATION.

Scientific Substantiation

Green claims must be supported by scientific evidence and verified by independent accredited certification bodies.

Eliminating Misleading Claims

The directive removes vague or unsubstantiated claims like 'eco-friendly' unless backed by credible data.

Encouraging Certification

Recognized ecolabels and certifications will increase transparency and consumer confidence.

Consequences of Non-Compliance

Businesses face reputational damage and legal consequences if they fail to comply with the directive.



PRACTICAL EXAMPLES IN TOURISM

CLAIM EXAMPLES

Non-compliant Claims

“We want to leave traces. That’s why we not only take care of our guests and crew, but also of the environment.”

● *Issue:* This is a **vague, emotive statement** with no measurable meaning.

“We are not only talking about the drive technology, which now uses a synthetic and much cleaner-burning diesel fuel...”

● *Issue:* “Much cleaner-burning” is a **comparative claim** – you must be able to quantify *how much cleaner* and in what way (e.g., lower NO_x, CO₂ emissions).

“From the outset, we have designed our river ships thoughtfully to reduce their fuel consumption.”

● *Issue:* “Thoughtfully designed” is subjective and not measurable. “Reduce their fuel consumption” is unquantified.



ENSURING
COMPLIANCE



AVOIDING MISLEADING CLAIMS

Clear and Specific Language

Use precise terms supported by evidence to avoid vague or misleading environmental claims.

Credible Data Support

Substantiate claims with reliable data like energy use, waste reduction, and carbon offsets.

Independent Verification

Ensure claims are validated by recognized certification bodies for credibility.

Ongoing Compliance and Training

Regularly review marketing materials and train staff on sustainability communication and legal standards.

Original text:

“Our river cruise fleet has been thoughtfully designed with eco-friendly elements. These include energy-saving LED lights, special insulated windows that reduce energy needs for heating and cooling, power locks to plug into a port’s power supply instead of running generators, solar heating systems, water treatment plants that provide microfiltration and recycling of all water used on board.”

To make the statement safer and more clearly compliant, you might:

- Replace “eco-friendly elements” with something more measurable, e.g. “environmentally improved features” or “features designed to reduce environmental impact”, or specify what “eco-friendly” means in terms of performance or standards.
- Add data or some quantification
- Reference certifications or verification if available (for example, “windows certified to [standard]”, “water treatment system certified to [standard]”, etc.).
- Clarify what is meant by “all water used on board” – grey water vs black water, reuse for what purpose (non-potable uses, etc.), are there any exceptions?

Improved to be in line with the directives:

“Our river cruise fleet includes energy-saving LED lights that use X% less wattage than standard lighting; EN1279 insulated windows with U-value of X that reduce heating/cooling energy by Y%; shore-power connections at ports so generators are seldom in use; solar heating systems supplying Z% of hot water needs; water treatment plants providing microfiltration and recycling of up to X litres per day (or of all non-potable / all grey water) used on board.”

NON-COMPLIANT
STANDARDS

EXAMPLES WHY CERTAIN STANDARDS ARE NON-COMPLIANT.

Lack of Third-Party Verification

Some standards lack independent third-party auditing, relying on businesses' self-assessments without impartial verification; auditors are employed by the standard or hired as freelancers.

Risk of Consumer Misinformation

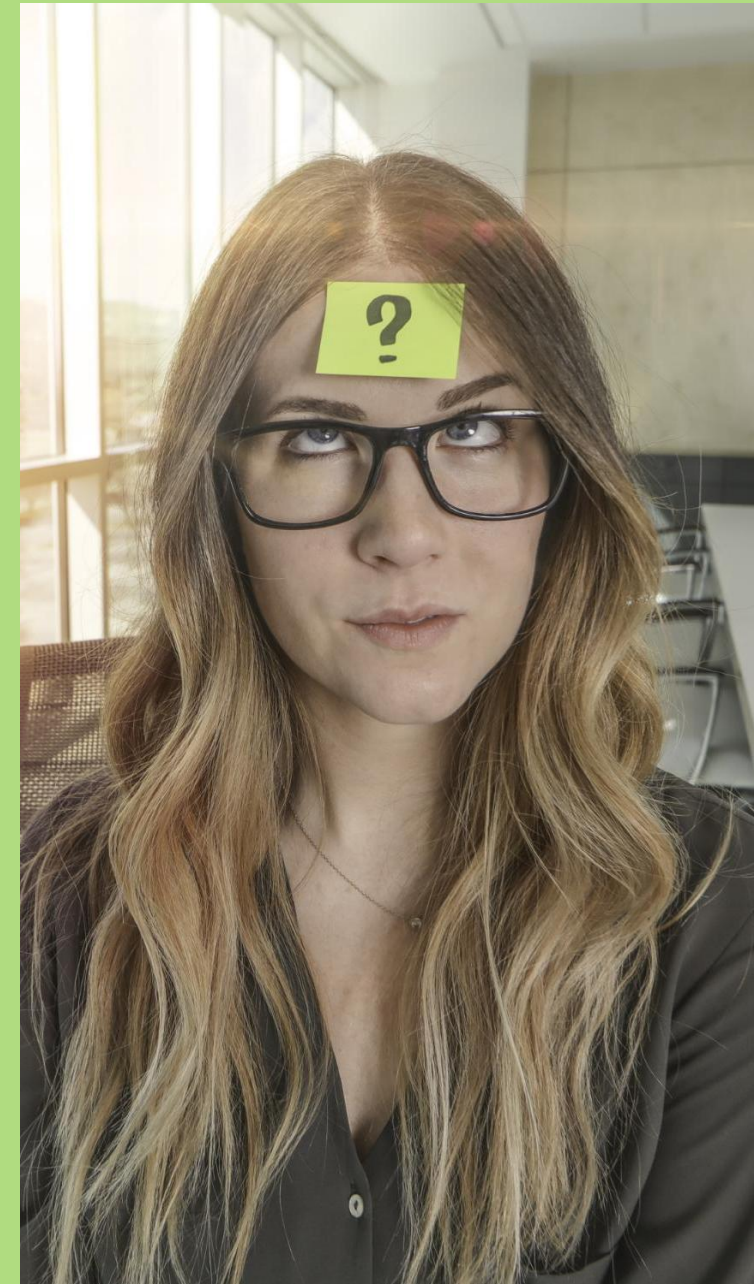
Non-compliant labels can mislead consumers and increase risk of regulatory penalties for businesses. E.g aggregated scoring Bronze, Silver, Gold -> compliance to a certain percentage of the criteria. The consumer has no clue.

Lack of Transparency

Many tourism sustainability standards lack clear criteria, reducing transparency for businesses and consumers. Ambiguous language misleads consumers about true environmental performance and harms trust.

Absence of Scientific Proof

Standards often miss requiring scientific evidence, contradicting the Green Claims Directive requirements.



CERTIFICATION ECOSYSTEM



ROLE OF CERTIFICATION

Ensuring Compliance

Certification helps tourism businesses comply with EU sustainability directives through verified standards.

Enhancing Credibility

Third-party certification boosts business credibility by proving adherence to established environmental standards.

Facilitating Transparency

Certified companies publish audit results or sustainability reports to maintain transparency with stakeholders.

Market Differentiation

Certification allows tourism businesses to market environmental credentials and stand out in competitive markets.

Based on the EU Empowering Consumers Directive (Directive (EU) 2024/825), the statement:

“We employ every auditor/surveyor directly. This implies that no third-party inspectors are used to carry out audits.”

is not compliant with the directive's requirements for sustainability certification schemes.

CONCLUSION

SUMMARY AND CONTACT INFORMATION

Compliance with EU Directives

Tourism businesses must comply with EU Empowering Consumer Directive and in due time with the Green Claims Directive to ensure transparency and avoid misleading claims.

Certification Ecosystem Importance

Certification involves Standards, Accreditation bodies, Certification bodies, Third-party verification, and qualified auditors to maintain trust and integrity in environmental claims.

Avoiding Non-Compliant Standards

Businesses should be cautious of standards lacking transparency and verification to prevent misleading consumers.

Importance of Credible Standards

Tourism organisations must choose standards recognised by reputable bodies and aligned with EU directives.





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FOR MORE INFORMATION