# DONAU SOJA ORGANISATION

## Corporate Guideline

*Empowering Consumers for the Green Transition (EmpCo)*

**Directive (EU) 2024/825**

**Applicable from 27 September 2026 |**
**B2C-communication | EU-wide | No transition period!**

***September 2026***

## Table of content


1. Introduction and purpose of this document ..... 3
2. What is EmpCo? – overview and political context ..... 4
   2.1 Key facts at a glance ..... 4
   2.2 Political context: EmpCo within the EU Green Deal ..... 4
   2.3 Core objective: protecting consumers from misleading environmental communication ..... 6
   2.4 Scope: who is affected? ..... 6
   2.5 Sanctions and enforcement ..... 8
3. EmpCo relevance for Donau Soja ..... 9
   3.1 How our standard meets EmpCo requirements ..... 9
   3.2 Where EmpCo directly affects members & partners ..... 10
   3.3 Three areas in focus ..... 10
   3.4 EmpCo as a market opportunity ..... 11
4. Overview of EmpCo regulations ..... 12
   4.1 Prohibition of general, unsubstantiated claims ..... 12
   4.2 Substantiation requirements for $CO_2$ and climate claims ..... 12
   4.3 Stricter rules for product comparisons ..... 13
   4.4 Requirements for environmental labels & seals ..... 13
   4.5 Information obligations: durability & repairability ..... 14
   4.6 Claim risk categorisation ..... 14
5. EmpCo for Donau Soja target groups ..... 15
   5.1 For retail partners ..... 15
   5.2 For members and partners along the value chain ..... 15
6. Key take-aways ..... 17
   6.1 Ground rules to always observe ..... 17
   6.2 Do's and don'ts – quick overview ..... 18
8. Logo usage rules ..... 19
   8.1 Overview: who may use which logo? ..... 19
   8.2 Technical requirements for logo display ..... 19
   8.3 Prohibited logo uses ..... 20
   8.4 Online use ..... 20
9. Practical cases – EmpCo-compliant communication in practice ..... 21
10. FAQ – frequently asked questions ..... 23
11. Contact and further resources ..... 24
12. Glossary ..... 25

# 1. Introduction and purpose of this document

Sustainability sells, but only if it can be substantiated. The Directive on Empowering Consumers for the Green Transition (EmpCo), Directive (EU) 2024/825, establishes clear rules that environmental claims in communications must be verifiable and specific and backed by recognised certifications. Failure to comply not only risks fines, but also loss of trust.

This document explains what EmpCo means in practice for Donau Soja, our members, partners, and retail partners. It demonstrates how we currently communicate in a manner that complies with EmpCo and how our partners can structure their communications in a way that is both safe and compliant with the rules.

**This document is addressed to:**

- Retail partners marketing products with Donau Soja or Europe Soya certification.
- Members and partners along the value chain (producers, processors and traders)
- Donau Soja staff in marketing, communications, and key account management (stakeholder relations).

**How to use this document:**

- Chapters 1–4: Regulatory framework and its relevance to Donau Soja
- Chapters 5–8: Target-group-specific recommendations for action
- Chapter 9: Real-world examples from our campaigns

***Note:*** *This document is not a legal opinion. For specific legal questions, we recommend consulting a legal adviser.*

# 2. What is EmpCo? – overview and political context

## 2.1 Key facts at a glance

The Directive on Empowering Consumers for the Green Transition (EmpCo) Directive (EU),2024/825, has been in force since 26 March 2024. From 27 September 2026, it will apply bindingly across the EU. This means that all sustainability claims must be clear, substantiated, and non-misleading; otherwise, legal consequences may follow.

***Important: There is no transition period for existing content!***

*From 27 September 2026, already published materials (websites, social media content, stock materials, PDFs) may be reviewed by the authorities.*

## 2.2 Political context: EmpCo within the EU Green Deal

EmpCo is a key part of the **EU Green Deal** and the **New Consumer Agenda** Action Plan. It complements other relevant EU frameworks with which Donau Soja is already familiar:

| EU framework | Brief description | Interface with EmpCo | Relevance for Donau Soja | Official source |
|---|---|---|---|---|
| **The EU Deforestation Regulation (EUDR) –** Regulation (EU) 2023/1115 | It prohibits the placing on the market of products associated with deforestation or forest degradation. This applies to soya, beef, palm oil, timber and their derivatives. | The EUDR requires companies to conduct due diligence and ensure traceability. EmpCo regulates how this evidence is **communicated**: 'deforestation-free' claims must be based on verified evidence – general statements without EUDR-compliant proof are not permitted. | **Highly relevant**. Soya is explicitly named as a product under the EUDR. Both Donau Soja and Europe Soya certify deforestation-free production chains. Our members and retail partners use 'deforestation-free' as a key selling point, and this must be substantiated under both frameworks. The combination of the EUDR and the EmpCo makes our certification a **dual verification instrument**. | EUR-Lex: Regulation (EU) 2023/1115 |
| **The Corporate Sustainability Reporting Directive (CSRD) –** Directive (EU) 2022/2464 | It requires large companies and listed SMEs to provide detailed sustainability reports in accordance with the | The CSRD establishes reporting obligations, while EmpCo establishes communication obligations. The sustainability targets reported by a company in its | **Relevant for our larger members and retail partners.** Trading companies that list DS/ES-certified products are increasingly subject to the Corporate Sustainability Reporting Directive | EUR-Lex: Directive (EU) 2022/2464 |

| | | | | |
|---|---|---|---|---|
| | European Sustainability Reporting Standards (ESRS). This will be phased in from 2024. | CSRD report must be consistent with those communicated in advertising. Inconsistencies will pose a liability risk. | (CSRD). Donau Soja can serve as a data source and provide certification proof in CSRD-compliant reports, thereby strengthening our partners' commitment to our standards. | |
| **The Green Claims Directive (proposal, in preparation)** – COM(2023) 166 | It specifies requirements for environmental claims that go beyond the EmpCo framework, such as pre-verification obligations for green claims, accredited verifiers and standardised life cycle assessment methods. | EmpCo establishes the legal framework, while the Green Claims Directive specifies the methodological requirements. Companies that communicate in an EmpCo-compliant manner today are well positioned, but they must actively monitor the development of the Green Claims Directive, as it is possible that it will be tightened. | **Strategically relevant.** Donau Soja should actively follow the development of the Green Claims Directive and further develop our PCF studies (BOKU, FiBL) as the basis for future life cycle evidence. Our existing certification system is a good starting point – but we need to futher develop it methodologically further to anticipate pre-verification obligations. | EUR-Lex: COM (2023) 166 - Proposal |
| **The EU Ecodesign for Sustainable Products Regulation (ESPR) –** Regulation (EU) 2024/1781 | It replaces the previous Ecodesign Directive, extending its scope to almost all physical products. It prescribes requirements for durability, repairability, recyclability and digital product passports. | Less directly relevant for food and feed, as the ESPR primarily targets non-food products. Indirect relevance exists: packaging of soya products and animal feed has to meet ecodesign requirements. EmpCo aspects will apply as soon as durability or sustainability claims are made about the packaging. | **Limited but growing relevance.** Relevant point of contact for Donau Soja: retail partners distributing DS/ES-certified food products will need to meet ecodesign requirements for their packaging. Communication about sustainable packaging must be EmpCo-compliant– coordination with our retail partners is required. | EUR-Lex: Regulation (EU) 2024/1781 |

## 2.3 Core objective: protecting consumers from misleading environmental communication

EmpCo pursues a clear objective: consumers must be able to distinguish genuine from false sustainability promises. Studies by the European Commission show that more than 50% of environmental claims examined in the EU were vague, misleading, or unsubstantiated (Source: https://environment.ec.europa.eu/topics/circular-economy-topics/green-claims_en).

EmpCo therefore creates binding rules for:

- The permissibility of environmental labels and seals
- The substantiation obligation for environmental claims
- The prohibition of general and unsubstantiated environmental labels
- Protection against misleading comparisons

## 2.4 Scope: who is affected?

EmpCo applies to all commercial operators marketing products or services to consumers, whether they are based in the EU or not, provided they serve the EU market. It covers:

- Manufacturers and processors
- Traders and importers
- Retailers and marketing managers

For Donau Soja, EmpCo applies directly to our members and retail partners in all EU member states. For our partners in Serbia and Ukraine, however, it does not apply directly; the respective national consumer protection laws apply instead. However, it influences market access to the EU and communication on EU markets.

**Donau Soja therefore recommends applying the EmpCo ground rules consistently:**

- **EU export:** As soon as products are marketed in the EU, the law country's laws apply, including EmpCo.
- **Accession perspective:** All three countries are EU accession candidates. Legal alignment is coming – those who adapt now will not need to retrofit later.
- **Uniform standard:** Contradictory claims in different markets undermine the credibility of our certification.

| Country | EmpCo Status | Applicable Consumer Protection Law | Relevance for Donau Soja |
|---|---|---|---|
| **Serbia** | Not directly applicable | Zakon o zaštiti potrošača (Consumer Protection Act, 2021); Zakon o oglašavanju (Advertising Act, 2016) – prohibit misleading advertising, but without EmpCo-specific greenwashing provisions. Alignment is expected within the EU accession process. | EU exports by Serbian producers and partners are subject to the law of the destination country. EmpCo-compliant communication is recommended for all EU-exporting members. |

| | | | |
|---|---|---|---|
| **Moldova** | Not directly applicable | Legea privind protecția consumatorilor (Consumer Protection Act, 2003, last updated); EU Association Agreement (2014) obliges gradual alignment with EU standards. | Moldova is an EU accession candidate (since 2022). Alignment with EU consumer law is expected. EmpCo requirements of the destination country apply for EU export communication. |
| **Ukraine** | Not directly applicable | Zakon Ukrainy pro zakhyst prav spozhyvachiv (Law on Consumer Rights Protection, last updated 2023); EU Association Agreement (2017) obliges gradual alignment. Specific greenwashing regulations do not currently exist. | Ukraine is an EU accession candidate (since 2022). The Ukrainian soya sector is increasingly exporting to the EU – EmpCo applies there. Donau Soja recommends designing all communication materials intended for EU markets in an EmpCo-compliant manner now. |

## 2.5 Sanctions and enforcement

EmpCo requires all EU member states to implement effective and proportionate sanctions. The responsibility for enforcement lies with national authorities, competition associations and consumer organisations.

**Possible sanctions (depending on national law):**

| Type of sanction | Details |
|---|---|
| Fines | Up to **4% of annual total turnover** for infringements with cross-border effect; in purely national cases, member states set the maximum limits. |
| Cease-and-desist notices | By competitors, consumer organisations, and competition associations. |
| Injunctions | Immediate cessation of impermissible communication by court or authority order. |
| Damages claims | Consumers may claim damages for misleading environmental claims. |
| Public disclosure | Authorities may publicly disclose infringements – with significant reputational damage. |

# 3. EmpCo relevance for Donau Soja

Donau Soja is a non-profit European membership organisation based in Vienna. Since 2012, we have been certifying non-GM, deforestation-free soya from Europe. Our network comprises more than 330 members in 33 countries, 866 certified partners, and regional offices in Serbia, Ukraine, and Moldova. 24 European governments have signed the Donau Soja Declaration or the Europe Soya Declaration. In 2024, the milestone of 1 million tonnes of certified Donau Soja and Europe Soya was reached. (Source: donausoja.org/en/organisation)

## 3.1 How our standard meets EmpCo requirements

The Donau Soja Standard and the Europe Soya Standard currently still exist in parallel (DS/ES Standard). In future, they will be merged into a single standard – the Europe Soya Standard.

This is based on the following core architecture:

- **Non-GM** – no use of genetically modified organisms, fully documented
- **European origin** – cultivation and harvest within defined geographical boundaries
- **Deforestation-free** – no contribution to deforestation or land-use change (LUC)
- **Sustainable production** – requirements for soil, water, biodiversity, and social standards
- **Third-party certification** – independent verification at every stage of the supply chain

💡 **Our standards are EmpCo-compliant, confirmed by an external legal assessment. Companies using the label automatically act in accordance with the Directive.**

This is demonstrated in the following ways:

| | |
|---|---|
| **Independent third-party certification** | Our standards are based on an independent verification system – they are audited and issued by accredited, independent certification bodies (not by Donau Soja itself). |
| **Transparent, publicly accessible criteria** | The standards and their criteria are publicly accessible and can be downloaded from our website: www.donausoja.org/downloads/ |
| **Regular review and updating** | Compliance with requirements is verified by independent certification bodies accredited in accordance with ISO/IEC 17065 – independent of both the scheme owner and the certified operator. |
| **Scientific basis** | $CO_2$ data are provided on the basis of PEF and ISO standards – available as branded data in recognised databases. PCF studies by BOKU University Vienna (ISO 14067, FAO-LEAP) and FiBL Austria document the environmental impacts of certified soya; life cycle assessments (LCA) feed into standard development. |
| **Traceability along the supply chain** | The DS/ES Standard covers the entire supply chain – from the growing area through processing and trade to the end product. Non-GM status, origin, and deforestation-free status are traceable at every stage. |

| | |
|---|---|
| **Clear consequences** | What happens in the event of violations is clearly regulated in our standards, e.g. withdrawal or suspension of label usage. |
| **Openness** | Our certification system is open to all business operators who are willing and able to meet the requirements. |
| **Stakeholder involvement** | We develop requirements jointly with experts and stakeholders from practice. |

## 3.2 Where EmpCo directly affects members & partners

Sustainability claims are a central instrument of market differentiation for Donau Soja members and partners. Wherever DS/ES-certified products are marketed and these claims come into contact with consumers, statements such as the following can be found:

**In animal nutrition and the feed industry:**

- "Animal feed with Europe Soya – up to 50% lower $CO_2$ emissions"
- "Non-GM soya from Europe – for sustainable animal husbandry"
- "Certified feed in accordance with the Europe Soya Standard"

**In the food industry:**

- "Produced with European non-GM soya"
- "Sustainable and non-GMO – certified to Donau Soja/Europe Soya Standard"
- "Tofu/soya drink from European, deforestation-free production"

**In trade and retail:**

- Shelf labelling, product descriptions, QR codes with sustainability information
- Campaign materials (print, digital, social media) with DS/ES labelling
- Sustainability reports

**In political and institutional communication:**

- Position papers, studies, and press releases with quantitative environmental impact data
- Communication with EU institutions, national authorities, and industry associations

## 3.3 Three areas in focus

EmpCo affects Donau Soja in three areas – and in all three we are well positioned:

**Non-GM as a quality characteristic**

Our certification is based on non-GM status. The term 'non-GM' is generally permissible under EmpCo because it is specific, verifiable and covered by independent certification. The prerequisites are proof by third-party certification, publicly accessible criteria, and no misleading context. Our standard comprehensively covers non-GM status – from seed documentation to end product labelling.

**Origin labelling: European and regional**

Statements such as 'soya from the Danube region', 'European origin', or 'locally produced' are only permissible under EmpCo if the geographical origin is clearly defined and verifiable and is

not used solely as a sustainability claim. The Donau Soja Standard defines clear geographical boundaries and links origin with specific sustainability criteria, making the 'European + certified' combination EmpCo-compliant.

**Environmental claims: $CO_2$ reduction, deforestation-free status, soil protection**

Quantitative environmental claims are the most demanding category under EmpCo. They are permissible if they are based on scientifically recognised methods (e.g. ISO 14067, FAO-LEAP, LCA methodology), comparison objects are clearly defined, and study design and sources are transparently disclosed. Our PCF studies by BOKU University Vienna and FiBL Austria meet these requirements. We are actively working to further develop this scientific basis.

## 3.4 EmpCo as a market opportunity

EmpCo increases the pressure on companies that have been working with unsubstantiated sustainability claims. For Donau Soja and our partners, this is a market opportunity:

- Retail partners listing DS/ES-certified products can lead their sustainability communication at the point of sale, in advertising, and online with a clear legal basis – while competitors must adapt or remove their claims.
- Members and processors can position DS/ES certification to trading partners as a demonstrable compliance contribution to EmpCo.
- Donau Soja presents itself to political institutions, NGOs, and media as an organisation that has been practising greenwashing prevention not since EmpCo – but since its founding.

💡 **We recommend that our partners actively name the DS/ES certification as an EmpCo-compliant labelling system in their communications – and always link to the publicly accessible standard criteria (DS/ES).**

# 4. Overview of EmpCo regulations

## 4.1 Prohibition of general, unsubstantiated claims

EmpCo supplements the "blacklist" of Directive 2005/29/EC (UCPD) with new prohibited practices. From 27 September 2026, the following statements are prohibited:

- General environmental claims without specific, verifiable reference/substantiation – e.g. environmentally friendly, eco-friendly, green, natural, sustainable, climate-friendly, ecological, biodegradable
- Environmental claims that relate to the entire product, but only apply to a specific aspect – e.g. "sustainable packaging" when advertising the overall product
- Own sustainability seals without external certification

| ❌ **Not permitted** | ☑ **Permitted** |
|---|---|
| "Environmentally friendly"<br>"Our soya is sustainable" *(general, without substantiation)* | "Certified to Donau Soja Standard – European, non-GM, deforestation-free" |
| "Sustainably produced" *(without proof)* | "Sustainably produced – certified to DS/ES Standard by independent third party" |
| "Climate-friendly animal feed" *(without substantiation)* | "–40% $CO_2$ emissions through animal feed with Europe Soya* (acc. to PCF study BOKU Vienna, ISO 14067)" |
| "Green protein source" | "Non-GM soya from Europe – verified by the Europe Soya Standard" |
| "Our soya protects the rainforest" | "Deforestation-free certified to Europe Soya Standard – verified, traceable, European" |

## 4.2 Substantiation requirements for $CO_2$ and climate claims

Quantitative climate claims are permissible – but only with a clear basis:

| **Claim** | **Status** | **Requirement** |
|---|---|---|
| "–40% $CO_2$ emissions*" with footnote and study reference | ☑ Permitted | Scientific methodology, comparison object, source |
| "Climate-neutral" without emissions reduction plan | ❌ Prohibited | – |
| "$CO_2$-compensated" only through certificate purchase | ❌ Prohibited | – |
| "Net zero by 2030" without verified plan | ❌ Prohibited | – |

| | | |
|---|---|---|
| Up to –50% $CO_2$** with FiBL study reference | ✅ Permitted | Range clearly justified, source cited |

**Donau Soja** uses exclusively PCF-supported $CO_2$ claims based on the BOKU study (ISO 14067, FAO-LEAP) and FiBL studies. We deliberately avoid the term 'climate-neutral'.

## 4.3 Stricter rules for product comparisons

Comparative environmental claims – i.e. claims that compare one's own product or company with another – are permissible under EmpCo, but only if:

- The **comparison object** is clearly named: what is being compared with what? (product vs. product? Production method vs. production method? Industry average?)
- The **comparison methodology** is transparent and scientifically recognised
- The **database** is current, traceable, and independently verified
- The same functional unit, the same life cycle, and the same system boundaries apply (only compare eggs with eggs)

| ❌ **Not permitted** | ✅ **Permitted – Donau Soja example** |
|---|---|
| Our soya is more sustainable than imported goods / than average *(no definition & data proof)* | Up to –42% lower $CO_2$ emissions through animal feed with Europe Soya* (acc. to LCA study by FiBL Austria (ISO 14040 and 14044; IPCC GWP 2013 100a (V1.03)) |
| The greenest/most sustainable protein in Europe (superlative without verified evidence) | Non-GM, deforestation-free, European – verified to DS/ES Standard |
| Better for the environment than overseas soya/conventional *(no comparison framework/no scientific basis)* | Up to 42% lower $CO_2$ emissions through animal feed with Europe Soya** (acc. to the LCA study by FiBL Austria (ISO 14040 and 14044; IPCC GWP 2013 100a (V1.03)), cradle-to-farm-gate. Comparison: pork (1 kg live weight) of the brand GUSTINO Strohschwein 'Klimafit' with Donau Soja-certified feed vs. pork from a comparable system with overseas soya (50% USA, 50% Brazil))" |

## 4.4 Requirements for environmental labels & seals

EmpCo regulates for the first time in a binding manner environmental labels and sustainability seals may be used in the B2C area.

✅ **A label is only permissible if it:**

- Is based on a recognised certification system
- Is verified by an independent third party – not by the company itself

- Has transparent, publicly accessible criteria
- Is regularly updated and reviewed
- Does not create false equivalences with official eco-labels

**The Donau Soja Standard and the Europe Soya Standard fully meet all these requirements – our labels can continue to be used without restriction from 27 September 2026.** *(For a detailed argument, see chapter 3.1 How our standard meets EmpCo requirements)*

## 4.5 Information obligations: durability & repairability

EmpCo also introduces new information obligations regarding product durability and repairability; these are less directly relevant for the food and feed sector. However, indirect points of contact exist for Donau Soja:

- **Packaging communication:** Statements about the sustainability or recyclability of the packaging of soya products (e.g. soya drinks, tofu, feed) must be EmpCo-compliant.
- **"Fresh" and shelf-life claims:** Misleading information about the shelf life of processed soya products would be impermissible.
- **B2B vs. B2C area:** EmpCo applies primarily to B2C communication. In the B2B area, the rules only apply if communication is indirectly addressed to consumers.

💡 ***Important for retail partners:*** *Our standards relate exclusively to the product, not the packaging. Statements about packaging must therefore be substantiated separately and communicated clearly as an independent claim (not in connection with the certification).*

## 4.6 Claim risk categorisation

| Risk | Typical formulations | Recommendation |
|---|---|---|
| 🔴 **High risk** | "sustainable", "green", "climate-neutral", "$CO_2$-neutral", "eco-friendly", "planet-friendly" | Do not use! Only possible with very strong definition and proof. |
| 🟡 **Medium risk** | "reduces $CO_2$ by X%", "low carbon", "supports biodiversity" | Only use with scope + evidence + source citation. |
| 🟢 **Low risk** | "certified to Donau Soja Standard", "Non-GM", "European origin", "deforestation- and conversion-free with cut-off 2008" | Generally permissible if factually correct and standard clearly named. |

💡 **Tip:** Before every claim, ask yourself: How do we do this? Why are we like this? How can we prove it? If all questions are answered, the claim is on safe ground.

# 5. EmpCo for Donau Soja target groups

## 5.1 For retail partners

Retail partners marketing products with Donau Soja or Europe Soya certification must ensure that all sustainability claims on packaging, at the point of sale (POS), and in advertising materials are EmpCo-compliant.

**What remains permissible:**

- "Certified to Donau Soja/Europe Soya Standard" – with visible DS/ES label
- "Non-GM soya from Europe – verified by the Europe Soya Standard"
- "European, deforestation-free, non-GMO – certified to DS/ES Standard"
- Quantitative $CO_2$ claims, provided they are substantiated with study reference, methodology, and comparison object (e.g. via footnote, QR code, or link)

**What must be adapted or removed:**

- General statements such as "sustainable", "green", "environmentally friendly" without specific reference to the DS/ES Standard
- Own company seals without external certification
- $CO_2$ claims without source citation – including on shelf labels or in print advertising
- Statements such as "climate-neutral" or "$CO_2$-compensated" that are based exclusively on compensation

**Recommendations for action:**

- Review existing POS materials (shelf wobblers, stickers, displays) for impermissible claims
- All environmental labels on products must be based on the DS/ES Standard and clearly name it
- $CO_2$ claims must be accompanied by a source citation (study, methodology, comparison framework)
- QR codes or links to sustainability evidence are a recognised method for space-limited formats (banners, labels)
- Design new materials exclusively with specific, substantiated claims

## 5.2 For members and partners along the value chain

Producers, processors, and traders who are DS/ES-certified benefit from a clear advantage: their communication is already secured by the standard. However, EmpCo creates new requirements that also become relevant in B2B communication when content is indirectly addressed to consumers.

**What changes:**

- **Product labelling**: Environmental labels on packaging and delivery notes must be EmpCo-compliant – even if the goods are primarily marketed B2B.
- **Marketing materials:** Brochures, trade fair appearances, and digital presentations with environmental claims require a substantiation basis.

- **Supply chain communication:** When sustainability information is passed on to trading partners who in turn use it with consumers, responsibility for the substantiation obligation lies with the original claim holder.

**What remains:**

- DS/ES certification as the complete basis for all standard-covered claims
- All DS/ES standard criteria are publicly accessible – this is the basis of every substantiation obligation
- PCF studies (BOKU Vienna, FiBL Austria) as scientific proof for $CO_2$ claims

**Recommendations for action:**

- Review communication materials for unsubstantiated environmental claims – including B2B presentations
- Keep DS/ES certification documents up to date – they are the central verification instrument
- In case of doubt about individual claims: consult Donau Soja

# 6. Key take-aways

## 6.1 Ground rules to always observe

**1. Specific rather than general**

Every environmental claim must relate to a specific, demonstrable aspect. General terms such as sustainable, green, or climate-friendly are not permissible without specific reference.

❌ *"Sustainably produced soya"*
✅ *"Non-GM soya from Europe – certified by the Europe Soya Standard"*

**2. Substantiate rather than assert**

Quantitative claims – in particular $CO_2$ claims – must be substantiated with study references, methodology, and comparison object. The source must be findable by consumers.

❌ *"Up to 40% less $CO_2$"*

✅ *"Up to 40% lower $CO_2$ emissions through animal feed with Europe Soya* (acc. to the PCF study by BOKU University Vienna (ISO 14067, FAO-LEAP), cradle-to-farm-gate. Comparison: Austrian egg with Donau Soja/Europe Soya-certified feed vs. average EU egg.)"*

**3. Link and verify**

Every claim covered by the DS/ES Standard should be linked to the publicly accessible standard criteria – via footnote, QR code, or direct link.

✅ *All claims are verified by the Europe Soya Standard" + link to Europe Soya Standard*

**4. Name the standard**

The DS/ES Standard is our strongest basis. It should not remain in the background in communication – it is the argument.

❌ *Certified soya (without naming the standard)*
✅ *Certified by the Donau Soja Standard by independent third party"*

**5. No climate neutrality without a plan**

Statements such as climate-neutral, $CO_2$-neutral, or net zero are only permissible if a documented, verifiable emissions reduction plan exists. Compensation alone is not sufficient.

❌ *Climate-neutral soya*
✅ *–42% lower $CO_2$ emissions through animal feed with Europe Soya* (BOKU University Vienna, ISO 14067)*

**6. Social media in the company name is corporate communication**

All content published in the name of Donau Soja on LinkedIn, Instagram, Facebook, or other channels is subject to the same EmpCo requirements as print or website – organic posts and paid advertising alike.

✅ *Claims with standard reference and source citation – also on social media*
❌ *We are a sustainable organisation - without specific reference, also not permissible on LinkedIn*

## 6.2 Do's and don'ts – quick overview

| ✅ DO | ❌ DON'T |
|---|---|
| Name DS/ES Standard explicitly | General terms such as 'green', 'eco', 'natural' without reference |
| Substantiate $CO_2$ claims with footnote and source | $CO_2$ claims without study reference |
| Set link to standard criteria | Own seals without external verification |
| Use 'Non-GM' with certification proof | 'Climate-neutral' without verified reduction plan |
| 'Up to –X% $CO_2$*' with range justification | Superlatives such as 'the most sustainable soya in Europe' without proof |
| QR code or link as proof in space-limited formats | Greenwashing terms without standard reference |

# 8. Logo usage rules

The Donau Soja Organisation owns all rights to the logos "Donau Soja", "Europe Soya", "Dunav Soja", and "Donau Soja Partner". Usage is governed by contract and requires approval on a case-by-case basis.

## 8.1 Overview: who may use which logo?

| Logo | Who may use it? | Where permitted? | Restrictions |
|---|---|---|---|
| **Donau Soja** | Exclusively Donau Soja members (after individual application and approval) | Website, leaflets, videos, brochures, business cards, signs, packaging (certified products only) | Wording may not be changed. Only in colour or B/W. No use on invoices, letterhead, or accompanying documents. |
| **Europe Soya** | Exclusively Donau Soja members (after individual application and approval) | Internationally usable. Same media as Donau Soja logo. | Wording may not be changed. No use on non-certified products. |
| **Dunav Soja** | Exclusively Donau Soja members in Serbia | Only usable in Serbia. | Only in Serbia. Serbian language version. MUST NOT be placed on products. |
| **Donau Soja Partner** | Certified operators and members | Advertising materials, not on products. | MUST NOT be placed on products. |
| **Fed with Donau Soja/Fed with Europe Soya** | Members with certified feed | Product labelling, if all soya components are certified. | Generally not on advertising materials and non-certified products. |

## 8.2 Technical requirements for logo display

| **Colour and Size Requirements** |
|---|
| **Colours:** Pantone Green 368 C \| Pantone Blue 2925 C<br>**CMYK:** Blue: 80% Cyan + 20% Magenta \| Green: 60% Cyan + 100% Yellow<br>**Lettering:** The lettering "Donau Soja", "Europe Soya", and "Dunav Soja" must always be in white.<br>**Black and white:** Permissible in accordance with Donau Soja specifications. |

**Minimum size:** 1 x 1 cm (logos with text: 1.5 x 2 cm, e.g. Serbian version)
**Size ratio:** Must be proportionate to other logos (neither larger nor smaller than other quality marks).
**Other colours:** Not permissible. The logo may only be modified by the Donau Soja Organisation.

## 8.3 Prohibited logo uses

| ❌ Not Permitted | ✅ Permitted |
|---|---|
| On invoices, letterhead, or accompanying documents | On advertising materials, brochures, website (with link to www.donausoja.org) |
| On non-certified products (incl. soya drinks, tofu, oil, lecithin, flour) | On certified products, if all soya components are certified |
| General advertising statements such as 'We produce Donau Soja' (unless entire operation has been converted) | 'This product is certified to Donau Soja Standard' (for the specific product) |
| Using logo without approval by Donau Soja Organisation | Submit application, send laid-out specimen, await approval |
| Donau Soja Partner logo on products | Donau Soja Partner logo on advertising materials and corporate communication |

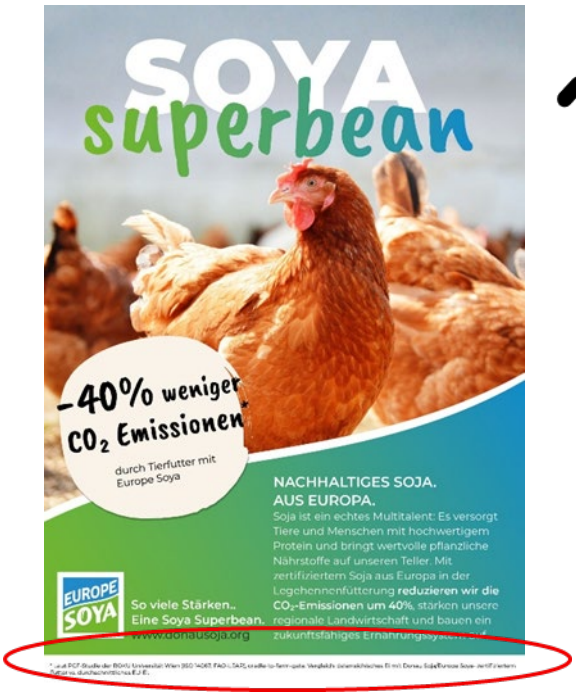
## 8.4 Online use

When using the logo online (website, blog, social media, etc.), the logo must be linked to the Donau Soja website www.donausoja.org. The right of use expires automatically upon termination of membership or licence. All advertising materials bearing the logo must then be removed immediately.

# 9. Practical cases – EmpCo-compliant communication in practice

The following examples are taken from real Donau Soja campaigns (as of June 2026). They show concretely what measures were taken to design communication in an EmpCo-compliant manner.

## Case 1 – Animal Campaign "Soya Superbean": advertisement (egg sector)




*According to the PCF study by BOKU University Vienna (ISO 14067, FAO-LEAP), cradle-to-farm-gate. Comparison: an Austrian egg with Donau Soja/Europe Soya-certified feed vs. an average EU egg.*

## Case 2 – Animal campaign "Soya Superbean": social media carousel with partners (pork sector)

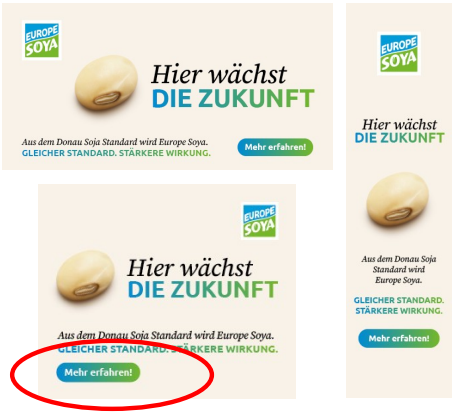
**Example: Lidl**

*According to the LCA study by FiBL Austria (ISO 14040 and 14044; IPCC GWP 2013 100a (V1.03)), cradle-to-farm-gate. Comparison: pork (1 kg live weight) from the GUSTINO Strohschwein "Klimafit" brand, fed with Donau Soja-certified feed, versus pork from a comparable system using overseas soya (50% from the USA, 50% from Brazil).*

## Case 3 – Europe Soya campaign: print advertisement (half-page) and online banner

**Print advertisement (half-page)**
A QR code links to the landing page, providing evidence and access to the Europe Soya Standard criteria.

**Online banner**
Call to action and link to the landing page, providing access to the Europe Soya Standard criteria.




**Landing page**
Linked footnotes and asterisks direct users to the Europe Soya Standard criteria.

**DONAU SOJA** Wiesingerstrasse 6/14
Promoting a sustainable and European protein supply 1010 Vienna
www.donausoja.org +43 1 512 17 44 10

# 10. FAQ – frequently asked questions

| |
|---|
| **Does EmpCo also apply to B2B communication?** |
| EmpCo applies primarily to B2C communication. B2B communication is, however, relevant if it is indirectly addressed to consumers or functions like consumer advertising (e.g. simplified green claims in sales presentations). |
| **Do we need to change our packaging?** |
| Only if the current claims are not EmpCo-compliant. Certified claims with standard reference and source citation continue to be permissible. A claim inventory is recommended. |
| **Are old social media posts also affected?** |
| Yes. All publicly accessible content that is still online after 27 September 2026 is subject to EmpCo – regardless of the date of publication. |
| **May we continue to use the Donau Soja/Europe Soya logos?** |
| Yes, as a member with a valid licence and approval. Usage must comply with the logo guidelines (see Chapter *8. Logo usage rules*). Online, the logo must be linked to www.donausoja.org. |
| **Is the QE model (quantity equivalence) compatible with EmpCo requirements?** |
| The QE model can continue to be used for **Europe Soya**, as the label stands for soya from across Europe and AB-ES soya (recognised goods meeting minimum requirements such as non-GM status, European origin, and deforestation-free production) delivers exactly what consumers expect. For **Donau Soja**, however, consumers clearly associate the label with soya from the Danube region – therefore, within the QE model, exclusively AB-ES soya from the Danube region may be used, in order to maintain the trust and credibility of the label. |
| **What is the difference between Donau Soja and Europe Soya?** |
| Europe Soya has the same standard as Donau Soja, but an expanded geographical scope (all of Europe instead of the Danube region). All sustainability requirements are identical. |
| **Who approves logo usage?** |
| Donau Soja Organisation approves each individual case. Submit application, send laid-out specimen, and await approval (see Chapter *8. Logo usage rules*). |
| **What happens in the event of EmpCo violations?** |
| Possible sanctions: fines of up to 4% of annual turnover, cease-and-desist notices, injunctions, damages claims, and public disclosure of violations. |

# 11. Contact and further resources

For questions about EmpCo-compliant communication, logo usage, or claims, please contact:

**Matthias Mohrs**

Director Sustainable Value Chain Solutions

mohrs@donausoja.org

**Iryna Korchahina**

Marketing and Communication Manager

korchahina@donausoja.org

General enquiries: office@donausoja.org

**Donau Soja Organisation | Wiesingerstraße 6/9 | 1010 Vienna**

www.donausoja.org

## Further resources

- Donau Soja Standard criteria: https://www.donausoja.org/wp-content/uploads/2026/01/Donau-Soja_Guidelines_full_document_2026.pdf
- Europe Soya Standard criteria: https://www.donausoja.org/wp-content/uploads/2026/01/Europe-Soya-Guidelines_full_document_2026.pdf
- Donau Soja Certified Partners: donausoja.org/certified-partners
- EU EmpCo Directive (EUR-Lex): Directive (EU) 2024/825
- BOKU PCF study (ISO 14067, FAO-LEAP): available on request from Donau Soja
- FiBL Austria LCA studies: available on request from Donau Soja
- EmpCo guide for SMEs (01/2026): available on request or download
- Donau Soja Agreement on the Use of the Standard Logos Donau Soja, Europe Soya, and Dunav Soja: available on request from Donau Soja
- Visual communication examples based on the Animal & Europe Soya Campaign

# 12. Glossary

| | |
|---|---|
| **EmpCo** | Abbreviation for the Directive on Empowering Consumers for the Green Transition (Directive (EU) 2024/825) |
| **UCPD** | Unfair Commercial Practices Directive – Directive on unfair commercial practices (2005/29/EC) |
| **Greenwashing** | Misleading or unsubstantiated environmental claims in corporate communication |
| **Environmental label** | Officially recognised labels indicating the sustainability properties of a product |
| **Non-GM/Non-GMO** | Non-GM: for soya and soya products. Non-GMO: for nouns (e.g. non-GMO Summit). No genetically modified organisms. |
| **DS Standard** | Donau Soja Standard – the certification system of the Donau Soja Organisation |
| **ES Standard** | Europe Soya Standard – identical requirements to DS Standard, but for all of Europe |
| **Third-party certification** | Independent verification and certification by an external body (ISO/IEC 17065 accredited) |
| **PCF study** | Product Carbon Footprint study – calculation of the $CO_2$ footprint of a product (e.g. in accordance with ISO 14067) |
| **LCA** | Life Cycle Assessment – life cycle analysis for evaluating environmental impacts |
| **PEF** | Product Environmental Footprint – EU methodology for calculating the environmental footprint of products |
| **EUDR** | EU Deforestation Regulation – EU regulation against deforestation (Regulation (EU) 2023/1115) |
| **CSRD** | Corporate Sustainability Reporting Directive – EU directive on sustainability reporting |
| **B2C** | Business-to-Consumer – communication directly to end consumers |
| **B2B** | Business-to-Business – communication between companies |
| **UWG** | Bundesgesetz gegen den unlauteren Wettbewerb (Austria) – national implementing law of the UCPD |