



April 27th, 2026

Fair for Life/For Life – Update on our EmpCo readiness roadmap

Dear partners,

As the implementation of Directive (EU) 2024/825 - commonly referred to as EmpCo - approaches, **we want to share with you how we are preparing the Fair for Life and For Life Standards for this new regulatory context**. Our objective is simple: to ensure continuity, clarity and confidence for all clients using the label in the European market.

EmpCo increases scrutiny on environmental and sustainability-related claims and, more specifically, on the way sustainability labels are governed, substantiated and communicated to consumers. In practice, this means scheme owners must be able to demonstrate not only the substance of their standards and controls, but also the robustness of their governance, the transparency of their rules and the credibility of the label's use in the market.

A strong foundation for the transition to EmpCo

Fair for Life and For Life fall within the scope of EmpCo as voluntary sustainability labels covering both social and environmental dimensions.

Both schemes enter this new regulatory phase from a **solid foundation**. They already rely on a well-established certification architecture, with published rules, structured procedures, noncompliance management, stakeholder based standard development, and strong assurance mechanisms.

Most EmpCo expectations are therefore already met. The **remaining work concerns a limited set of points** where EmpCo introduces strengthened expectations. **These elements are being addressed** through targeted adjustments and formalization, building on the existing foundations and included in our **roadmap towards compliance by September 2026**.

Our readiness roadmap

EmpCo requirements	Status	How we meet the requirements
Consumer transparency	Aligned	Fair for Life and For Life requirements and criteria are publicly available on our website, providing clear and accessible information to consumers about what the standards stand for as well as the requirements that must be met to obtain them.



April 27th, 2026

Fair and Transparent Access for All Eligible Operators	Aligned	Participation rules, eligibility conditions and certification procedures are already defined in a transparent framework that applies equally to all entities able to meet Fair for Life & For Life requirements. This ensures predictable and fair access for any operator wishing to join.
Stakeholder involvement and standard-setting process	Aligned	Our standards are developed and revised through structured consultations and documented stakeholder engagement, which ensures a credible and accountable standard setting process. Stakeholder input is systematically considered in revisions, and our governance framework provides clear evidence of how decisions are made.
Certification decisions, controls and sanctions	Aligned	Designed to meet the requirements of ISO 17065 norm, the schemes operate with formal, documented procedures for assessment, non-compliance, suspension and withdrawal, ensuring the reliability and integrity of the certification system. These assurance mechanisms are firmly established and consistently applied, providing operators and clients with a clear and trusted framework for understanding how the schemes function.
Third-party verification performed according to recognized norms	Work in progress	This is the main area where further formalization is expected under EmpCo. While the schemes already operate with strict internal measures to guarantee independence and impartiality of the certification process in line with internationally recognized norms, the 2026 roadmap focuses on translating the directive's expectations into a clearer more robust framework by: • establishing a distinct organizational structure that formally separates scheme ownership from certification activities done by Ecocert, supported by updated governance documentation. • strengthening certification procedures to further align the standards verification system with internationally recognized norms such as ISO 17065.

Our ongoing work and what it means for you

We are **proactively managing the transition to EmpCo**, with a clear work plan focused on the areas where the regulation raises expectations for sustainability labels. **This work is fully aligned with the broader revision of the Fair for Life and For Life standards**, which aims to strengthen clarity, transparency and operational reliability.

As the regulatory landscape evolves, we are ensuring continuity for clients who rely on the label for sourcing commitments, retailer dialogue, ESG positioning and consumer trust. **The functioning of the schemes remains stable, and clients can continue using the label with confidence.**



April 27th, 2026

Furthermore, to support clients in making appropriate and well supported claims, **the standards are strengthening their rules and guidance for consumer-facing communication**. This work will provide clearer directions on how claims should be framed and applied across different communication channels.

Conclusion

The Fair for Life and For Life labels already meet the main requirements of Directive (EU) 2024/825 and are committed to strengthening provisions that ensure the neutrality, transparency and integrity of their certification system. The remaining adjustments are limited and fully integrated into our roadmap as scheme owner, which is designed to secure full compliance with EmpCo by September 2026.

We will continue to keep you informed as this work progresses. Our aim is to ensure that you feel confident and well accompanied at every step, and we look forward to updating you as the roadmap advances.