

bluepass

Frequently Asked Questions

*A companion to the bluepass Labels & Claims Guide (V2.0)
and the bluepass Transition Guideline (V1.0)*

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How to use this document

This FAQ collects the most common questions System Partner companies have asked about bluepass, the new certification mark, and the move from the bluesign® PRODUCT and bluesign® APPROVED marks. The answers here draw on the two bluepass webinar sessions and partner questions submitted before and after them.

It is a companion to two documents:

- the **bluepass Labels & Claims Guide (V2.0)**, the evergreen reference for the bluepass system, marks, claims, and label structure, and
- the **bluepass Transition Guideline (V1.0)**, which covers timelines, transition steps, and what to do with existing label stock.

Where this FAQ and the Labels & Claims Guide describe the same point, the Guide is the definitive reference. This FAQ explains the practical detail behind it. Each question is tagged with the audience it applies to, so you can move quickly to what is relevant for your business.

Quick paths by audience

If you sell consumer-facing products in the EU (brands and retailers):

Start with Section 1 (Timeline and ECGT), then Section 4 (Labels and QR codes), then Section 5 (Claims language).

If you produce articles (manufacturers):

Start with Section 1 (Timeline) for the B2B path, then Section 6 (Articles and ingredient labeling), then Section 8 (Assets and artwork).

If you supply chemical products:

Start with Section 1 (Timeline) for the B2B path, then Section 7 (Chemical product specifics), then Section 8 (Assets and artwork).

If you fit more than one category:

Some partners operate as both a brand and a manufacturer, or sell chemical products directly to consumers. In that case more than one mark applies to your products. Read every section relevant to your role.

A note on language: this FAQ, like the Guide, is written as recommendations. Under the EU rules on environmental claims, responsibility for a compliant claim sits with the company placing the

product on the market. The bluepass system is designed to support that responsibility. It does not replace independent legal advice.

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01

Timeline and ECGT compliance

Who needs to do what, and by when.

01 Timeline and ECGT compliance

Q1. [Brands] What is the minimum we need to do to comply with ECGT by 27 September 2026?

ECGT applies to consumer-facing environmental claims on products sold in the EU. For consumer-facing products you sell in the EU, your label needs to carry a substantiated claim by 27 September 2026.

The minimum requirement is an approved claim, plus a link or QR code that leads to the substantiation. Three label solutions meet that requirement. Any one of them is acceptable:

- Solution 1 (transitional): your existing bluesign® PRODUCT label plus a QR code that links to bluesign.com/verify. Useful if you have existing label stock to use.
- Solution 2 (acceptable): the bluepass mark plus a QR code only. A flexible option for partners with limited label space.
- Solution 3 (recommended): the full bluepass consumer product label (mark, approved text claim, QR code, and the 'Certified by' line). The most thorough option.

Update your digital communication (websites, product pages, e-commerce, marketing) in parallel so it aligns with the label you choose.

Out of scope: B2B labels on articles and chemical products, and products sold outside the EU.

Q2. [Brands] What if we cannot update everything by 27 September 2026?

ECGT is enforced by national consumer protection authorities. For products already in the distribution chain, reasonable and proportionate efforts are recognized. Recalling products already on the market is an unlikely outcome; corrective action on labels is more probable.

Practical recommendations during the transition:

- New production from now uses one of the three label solutions above.
- For existing inventory with hangtags carrying old claim text, cover the claim with a sticker that includes the bluepass mark and a QR code, or replace the hangtag.
- For labels with no claim text and no QR code, no action is needed. The bluesign.com website explains the meaning of these labels for consumers who search.
- If your situation makes the timeline difficult, contact bluesign. Partners with a unique situation are encouraged to discuss it directly so a workable solution can be found.

bluesign is not the enforcement body. Compliance responsibility sits with the company placing the product on the EU market. The bluepass system is designed to support that responsibility.

Q3. [Brands] Our development cycle runs two to three years and our upcoming labels are already finalized. How does this apply to us?

Long development cycles are a recognized reality, and bluesign has confirmed it will accommodate them. Mixed inventory carrying both the legacy and the bluepass marks is tolerated through the end of 2027. For development cycles longer than that, contact bluesign so an individual solution can be agreed.

For products finalized before assets are available:

- If feasible, switch to a bluepass solution at the point of repackaging or distribution.
- If not feasible, implement bluepass at your next label production cycle.
- Existing labels with the bluesign® PRODUCT or bluesign® APPROVED mark remain valid during the transition. There is no need to recall product.

Q4. [All audiences] We do not sell into the EU. Does any of this apply to us?

ECGT applies only to products sold in the EU, so its deadlines do not apply to products sold elsewhere. You can keep your current labels until your next label production cycle, then move to bluepass.

Moving to bluepass is required within the transition period. bluepass is the new certification mark of the bluesign System worldwide, not only in the EU. Aligning globally keeps your label inventory consistent and prepares you for similar regulations developing in other markets.

Q5. [Brands] Can we update our website and digital communication before 27 September 2026?

Yes, and it is recommended. The asset package is distributed to all System Partner companies on 22 May 2026. From that date you can move your digital communication (product pages, category pages, marketing copy) to the bluepass mark and approved text claims. Updating digital communication ahead of the deadline reduces last-minute risk.

Q6. [Manufacturers, Chemical suppliers] When do we need to transition our B2B labels?

ECGT does not apply to B2B labels. For manufacturers and chemical suppliers using non-consumer-facing bluesign® APPROVED labels, the transition to the bluepass mark is by the end of 2026. This gives time to update labels, digital communication, and trade show materials gradually.

Existing bluesign® APPROVED articles and chemical products remain valid. There is no need to recall existing inventory or relabel products already in your customers' supply chains. New production should move to the bluepass marks.

Q7. [All audiences] Who set these deadlines? Is bluesign setting them?

No. The deadlines are driven by regulation, not by bluesign. The 27 September 2026 date is the ECGT deadline. ECGT (the Empowering Consumers for the Green Transition Directive) was adopted in February 2024. The separation of the certification mark (bluepass) from the scheme owner (bluesign) is required by trademark regulation. bluesign is providing this guidance to help partners prepare and comply.

Q8. [All audiences] What is the full transition timeline at a glance?

Three dates matter:

- 27 September 2026: consumer-facing products sold in the EU need a substantiated claim (approved claim plus link or QR code). This includes ingredient labeling on consumer products.
- End of 2026: transition for B2B labels on articles and chemical products.
- End of 2027: point for the full transition to bluepass across all labels and communication, to align globally.

If you do not sell consumer-facing products in the EU, there is no fixed date. Move to bluepass at your next label production cycle.

02

Transition and existing labels

What to do with products and label stock already in motion.

02 Transition and existing labels

Q9. [Brands] What do we do about products already made, in transit, or in distributor warehouses?

Recommendations by stage:

- New production: use a bluepass solution from the point of asset availability.
- In-factory, not yet shipped: switch hangtags to a bluepass solution where operationally feasible.
- In transit or in distributor warehouses: update at the next point of repackaging where possible.
- Already on shelf at retail: enforcement authorities are expected to apply proportionality. Update at the next production or distribution cycle.

Q10. [Brands] Do we have to physically relabel products that are already made?

In most cases, no. The directive recognizes reasonable and proportionate efforts for products already in distribution. Mass recall or destruction of existing inventory is an unlikely outcome, and bluesign does not recommend unlabeled products.

Where you do want to update existing hangtags without reprinting them, the practical options are:

- Cover the existing claim with a sticker that includes the bluepass mark and a QR code linking to bluesign.com/verify.
- Replace the hangtag with one of the three solutions described in Q1.

If your existing hangtag already carries a QR code, see Q26 on redirecting it.

Q11. [Brands] What about sewn-in labels and hangtags with no claim text? Do we need to remove them?

No. Labels carrying only the bluesign® PRODUCT mark, with no claim text and no QR code, do not need to be removed. A label like this is not misleading on its own: it carries no environmental wording. Consumers who search for its meaning will land on bluesign.com, where the page explains what the legacy marks mean and confirms they are valid during the transition. The webpage closes the loop.

bluesign considers it more sustainable to leave these labels in place than to remove or destroy them.

Q12. [Brands] What about hangtags that carry the old claim text?

Hangtags carrying the old claim text are the most sensitive case. After 27 September 2026, the old claim on a consumer-facing product sold in the EU may be considered misleading. bluesign cannot guarantee how an authority would view it.

For these hangtags, the recommendation is to reprint with a bluepass solution, or, where reprinting is not feasible, to cover the old claim with a sticker carrying the bluepass mark and a QR code. If you are unsure how to handle a specific case, contact bluesign and a solution can be worked out individually.

Q13. [Brands] Are existing bluesign® PRODUCT and bluesign® APPROVED labels still valid?

Yes. Existing labels using the bluesign® PRODUCT and bluesign® APPROVED marks remain valid during the transition. The certification behind them has not changed. Only the certification mark name and the claim language have changed, to meet substantiation and trademark requirements. Same certification, same processes, same bluesign Criteria. bluesign.com explains to consumers that bluesign® PRODUCT and bluepass Consumer Product mean the same thing.

Q14. [Manufacturers, Chemical suppliers] We have existing labels stored at customer sites with the old mark. Do those need to be relabeled?

No. Articles and chemical products already in the distribution chain with the bluesign® APPROVED label do not need to be relabeled. The material itself is unchanged; only the label nomenclature has been updated. B2B labels are not in ECGT scope. New production should move to the bluepass marks.

Q15. [Brands] Season 2026 is in the market and our active season is 2027. Should we prioritize relabeling distributed product, or apply the change to new production?

Focus on new production. For product already distributed:

- If it carries only the bluesign® PRODUCT mark with no claim, leave it. bluesign.com closes the loop.
- If it carries the old claim text and is sold in the EU, covering the claim with a new claim or QR code is recommended (see Q12).

From now on, produce new labels with the bluepass mark and the approved claim. This is the most reliable way to be ready for the September 2026 deadline without disrupting product already on the market.

Q16. [Manufacturers] Our production for the coming season is already in progress. Do we update tags now, or with the next batch?

The asset package is distributed on 22 May 2026, and new production from that date should use bluepass. For production already in progress with hangtags already printed, continue with the existing version for that batch and implement bluepass from the next production run. If the product is consumer-facing and sold in the EU on or after 27 September 2026, the brand or retailer should also consider one of the transitional options in Q1.

03

Label format options

Two formats are valid. Choose based on space and how much detail you want on the product.

03 Label format options

Q17. [All audiences] What are the two label format options?

Every bluepass label is built from the same elements: the bluepass mark, the approved text claim, a QR code, and the line 'Certified by bluesign technologies ag.' There are two valid formats:

- **Recommended (full label):** the bluepass mark, the approved text claim, the QR code, and the 'Certified by' line. The most thorough option, since the certification scope is communicated directly on the product.
- **Acceptable (Mark + QR Label):** the bluepass mark and a QR code only, with no text claim. A flexible option for partners with limited label space. The full claim is substantiated through the QR code when scanned.

Both formats are valid on certified products, articles, and chemical products. In both cases, the QR code leads to the same verification page.

Q18. [Brands] Can we use a standalone bluepass mark with no QR code or claim text?

On physical labels, no. A physical bluepass label always includes a QR code, so the claim can be substantiated when scanned.

In digital applications, the mark can stand alone. Where a scannable QR code is not practical, the bluepass mark may be used on its own as an active link to the verification page (bluesign.com/verify). The mark stays clickable and leads to the bluesign-controlled page. This option is for digital use only.

Q19. [Brands] What needs to appear on a hangtag at minimum?

At minimum, a consumer-facing hangtag carries the bluepass mark and a QR code linking to bluesign.com/verify. That is the simplified label format. The full recommended label adds the approved text claim and the 'Certified by' line.

Q20. [Brands] Can both formats be used on care labels and sewn-in labels?

Yes. Both the recommended format and the simplified format work on care labels and sewn-in woven labels. The simplified format (mark plus QR code) is often the more

practical choice given the space, while still giving full access to the substantiation through the QR code.

A sewn-in woven bluepass label is optional, not required. A hangtag alone is acceptable. Whether to add a sewn-in label is the partner's choice; where one is used, it typically uses the simplified format.

Only whole-product marks are recommended on care labels. Care labels are read by consumers and regulators as referring to the entire product, so ingredient-level claims are not recommended on them.

Q21. [Brands] Is the certification ID number required on the label?

No. A certification ID number is not shown on the bluepass label. Earlier guidance included an editable ID number on the label artwork; after re-consulting legal advisors and an independent assurance and accreditation organization, bluesign confirmed the ID is not required on the label. The QR code carries the substantiation.

This means a single label design can cover many products. Use the most current label artwork files, which do not include the ID layer. Product-level identification through the QR code is part of the future roadmap (see Q24).

Q22. [Brands] The round mark uses more material than a rectangle. Can we use a rectangular label?

The round bluepass mark itself is the certification mark and cannot be modified. A rectangular label background that includes the round mark is acceptable; you do not need to cut the hangtag into a circle. The asset package includes label templates for both the recommended and simplified formats.

04

QR codes and verification

How the QR code works, where it leads, and what it connects to.

04 QR codes and verification

Q23. [All audiences] What is behind the QR code?

The QR code links to bluesign.com/verify, a page controlled and maintained by bluesign. The page confirms that the item carries a bluepass mark, explains what the mark means, and routes the visitor by product type (consumer product, article, or chemical product) to the right certification detail. It also explains how the bluesign System works and links to further resources, including the bluesign Guide and the bluesign Finder.

The verification page is the authoritative source for what a bluepass claim covers. It is updated continuously by bluesign, and partners do not need to build or host anything.

Q24. [Brands] Is the QR code generic, or do we need a unique code per product?

There is one bluepass QR code, not a different code per product. When the visitor lands on the verification page, they select the product type they scanned and the page routes them to the right information. This single-code approach also supports ingredient labeling, where an article or chemical product mark can appear on a consumer-facing product.

Product-level identification (a unique reference tied to each item) is part of the future roadmap. It is possible technically and can be added if a partner specifically wants it, but it is not required by law and not required for the current transition.

Q25. [All audiences] Will we need both a bluepass QR code and a Digital Product Passport QR code?

How a future Digital Product Passport (DPP) QR code will look, and exactly what it must contain, is not yet defined across the industry. bluesign wants to avoid product labels carrying many separate QR codes, and intends to align the bluepass QR code with DPP requirements as they become clear. The bluepass verification page is built with that future alignment in mind.

If you want to host bluesign data within your own product DPP, contact bluesign. Because the QR code sits behind a certification mark, bluesign needs to keep control of what it leads to, and will work through the approach with you individually.

Q26. [Brands] Our hangtag already has a QR code with no claim text. Can we redirect it instead of reprinting?

Redirecting an existing QR code to bluesign.com/verify is an acceptable option. If your hangtag already carries a QR code, you can redirect its destination to the verification page rather than reprinting the hangtag.

If you operate your own QR infrastructure, bluesign recommends discussing the destination content with bluesign before going live, so the page the QR code reaches is consistent with the approved substantiation. Contact info@bluesign.com to confirm the arrangement.

Q27. [Brands] Can we build our own landing page that links to bluesign.com/verify?

Partners with their own QR infrastructure or landing pages are welcome to discuss the destination content with bluesign before going live. bluesign recommends pointing people to bluesign.com/verify rather than republishing the detailed certification scope yourself: the verification page is the authoritative source and is kept current by bluesign, so replicating the detail elsewhere risks it going out of date.

Q28. [Brands] Will the bluesign.com/verify URL change?

The verification page itself may evolve, since bluesign continues to refine the content and navigation based on partner feedback. The page is the current reference for its exact content. You can preview it at bluesign.com/verify. Partners are encouraged to use it as the primary destination for bluepass QR codes and links.

Q29. [All audiences] What happens to the verification if a product's certification is discontinued?

The verification page explains what a bluepass certification means and links through to the bluesign Guide (for articles) and the bluesign Finder (for chemical products). If an article or chemical product is delisted or its certification is discontinued, it no longer appears on the Guide or the Finder. The verification path is unchanged; the discontinued item simply will not be found at the end of it.

Q30. [Chemical suppliers] Can our QR code link directly to our bluesign Finder entry instead of the verification page?

For non-consumer-facing, B2B use, yes. A chemical supplier can pair the bluepass mark with a QR code that links directly to their bluesign Finder entry, for an individual product or a product group. This is already possible today.

Where the chemical product is consumer-facing, or where you want a consumer to understand what the certification means, bluesign recommends linking to bluesign.com/verify instead, since the verification page explains the certification before routing through to the Finder.

05

Claims language

What you can say, what to avoid, and the language we recommend.

05 Claims language

Q31. [Brands] Can we say a product is 'bluepass certified'?

Yes. In written text, the following are acceptable when the certification applies to the whole product, article, or chemical product: 'bluepass,' 'bluepass certified,' 'bluepass product,' 'bluepass consumer product,' 'bluepass article,' 'bluepass chemical product,' and the 'bluepass certified...' versions of each.

Use 'bluepass certified' when you want to describe the product directly. 'bluepass' on its own is the umbrella term; 'bluepass consumer product' is the specific mark name. On certification labels, always use the full mark name. In running text, either is acceptable as long as the meaning is clear.

Q32. [Brands] What is the approved text claim for a consumer product?

The approved full claim for a consumer product label is:

"To help reduce adverse impact on people and the planet, this product was made with materials produced through processes that meet bluesign Criteria for product stewardship, resource productivity, environmental protection, worker and social responsibility, including management system requirements."

The article and chemical product claims follow the same structure, with 'this article was produced through processes...' and 'this chemical product was produced through processes...' respectively.

Q33. [Brands] Why is the claim text so long? Can we shorten it?

The full text was developed with legal and accreditation review to meet substantiation requirements. Each time the wording was shortened, the risk of misinterpretation rose. The full claim is the approved wording because it protects partners the most. Deviations from the approved wording must be reviewed with bluesign before use.

Where the full claim does not fit, use the simplified label format (the bluepass mark plus QR code only). The full claim is then substantiated through the QR code when scanned.

In plain text (not using the full bluepass label), please refer to the bluepass Label & Claims Guide for further information and instructions.

Q34. [Brands] How do we reference bluepass in spec lists or feature copy with limited space?

In a product's specification list or feature copy, a plain-text material callout is acceptable, and no bluesign QR code is required in that context. For example: 'Main shell: 100% nylon, bluepass material.' The short form sits directly next to the specific component it refers to. Where the format allows, adding a QR code or a link to bluesign.com/verify makes the claim stronger, and bluesign recommends it. Avoid using 'bluepass material' or 'made with bluepass components' as a general, whole-product attribute with no specific component named.

Q35. [Brands] Are there claims we should no longer use?

Yes. The following should be avoided:

- **'bluesign certified product'**: the certification mark is bluepass. Use 'bluepass certified' instead.
- **'bluepass approved'**: 'approved' belonged to the previous bluesign® APPROVED designation. The equivalent now is 'bluepass certified,' 'bluepass article,' or 'bluepass chemical product.'
- **Vague component claims** such as 'contains bluepass elements,' 'made with bluepass components,' or 'made with bluepass materials': these do not name the specific component and are difficult to substantiate.
- **Absolute or broad environmental language**: 'guarantees,' 'ensures,' 'protects,' 'zero,' 'eco-friendly,' 'green,' 'climate friendly,' 'biodegradable.' These are difficult to substantiate and may attract regulatory scrutiny.

Q36. [All audiences] Why 'processes that meet bluesign Criteria' instead of 'certified product'?

bluesign assesses production processes, not facilities as entities and not the finished product in isolation. The claim language reflects what is actually verified. Process-based language is also better aligned with how certification schemes are recognized under current regulation.

Q37. [Brands] Do marketing materials follow the same claim rules as labels?

Marketing materials are not on-product labels, so they are not directly within the ECGT on-product labeling rules. They remain subject to general consumer protection and misleading advertising law.

bluesign recommends that all product-related communication aligns with the certification claim used on the label, and does not introduce additional or more specific claims than those defined in the Labels & Claims Guide. Alignment keeps communication consistent and avoids consumer misunderstanding.

Q38. [Brands] Can we make material-level claims as well as whole-product claims, online and on a hangtag?

Yes. Material-level (ingredient-level) claims can be made online and on a hangtag, provided the claim makes clear which specific component it refers to (for example the shell fabric, the laminate, the insulation, or the zipper) and does not suggest the whole product is certified. Section 6 covers ingredient labeling in detail.

06

Ingredient labeling and articles

How to talk about specific certified components inside a product.

06 Ingredient labeling and articles

Q39. [Brands, Manufacturers] What is ingredient labeling, and when does it apply?

Ingredient labeling refers to a claim about a specific material or component within a product (for example a shell fabric, lining, trim, or accessory) rather than the finished product as a whole. Ingredient labeling has existed for many years, mainly for articles. It now also applies to chemical products.

It applies when a finished product contains certified components but does not meet the thresholds for a consumer-product-level claim, or when a partner wants to communicate specifically about a certified component. An ingredient-level claim must clearly indicate that certification applies to the specific component, not the entire finished product.

Q40. [Brands, Manufacturers] What are the acceptable formats for ingredient-level claims?

Two formats are acceptable:

- **Recommended (descriptive):** “[Material or component name] produced through processes that meet bluesign Criteria.” For example, “Shell fabric produced through processes that meet bluesign Criteria.”
- **Acceptable (short form):** ‘bluepass material,’ ‘bluepass certified material,’ or ‘bluepass [material or component name],’ for example ‘bluepass shell fabric’ or ‘bluepass laminate.’ Acceptable when the specific component is clearly identified and the claim does not suggest the entire product is certified.

Avoid vague claims that do not identify the specific component, such as ‘contains bluepass elements’ or ‘made with bluepass components.’

Q41. [Brands] Our product contains one certified component but the rest is not certified. What can we say?

This applies to brands that are bluesign System Partners. Non-System-Partner brands should refer to Q45.

You cannot use the bluepass consumer product mark, because the finished product does not meet the consumer-product certification thresholds. You can communicate the certified component using ingredient labeling:

- On the product detail page: 'This jacket is made with shell fabric produced through processes that meet bluesign Criteria.'
- On a hangtag or label: 'bluepass shell fabric' paired with the bluepass mark and a QR code.

Make clear the claim refers to the specific component, not the jacket as a whole. Do not state the jacket itself is bluepass certified unless every component meets the certification thresholds.

Q42. [Manufacturers] We produce articles (fabrics, accessories, trims). Can we put a bluepass label on our products?

Yes. As a manufacturer with certified articles, you can use the bluepass article mark on your B2B labels and documentation, in either the recommended or the simplified format. Articles are listed on the bluesign Guide (bluesignguide.com).

Your existing bluesign® APPROVED labels remain valid; the recommended transition to the bluepass article mark is by the end of 2026, or at your next label production cycle.

Q43. [Manufacturers, Chemical suppliers] Can we put a short-form ingredient claim on hangtags we produce for brands?

Yes. A manufacturer selling a bluepass-certified material may state 'bluepass laminate,' or the descriptive form 'Shell fabric produced through processes that meet bluesign Criteria,' on its own consumer-facing communication, including hangtags it prepares for brands. The same applies to a chemical supplier: a supplier providing a chemical product that creates a specific performance may state, for example, 'bluepass fluorine-free water repellent' on its own consumer-facing communication, such as hangtags for brands.

The component must be clearly identified, and the claim must not suggest the whole finished product is certified. For ingredient-level claims, bluesign asks System Partners to contact bluesign for further guidance, so the arrangement is set up correctly.

Q44. [Manufacturers] What does a manufacturer need to do to enable a brand to use our material as ingredient labeling?

To enable a brand to make an ingredient-level claim about your certified component, the following is required:

- Your material is registered and listed on the bluesign Guide, with a bluesign Guide ID.
- The certified component is clearly named, and its bluesign Guide ID is included.
- You then either:
 - prepare the label or hangtag for your certified component and provide it to the brand, or
 - authorize the brand to use your bluesign Guide ID to declare the component in its own communication, with bluesign informed which brand is authorized and for how many products.

The brand making the claim is then responsible for verifying that the article is certified, using the bluesign Guide ID. Contact bluesign to set this up; the detail is also covered in the terms and conditions and the Labels & Claims Guide.

Q45. [Brands] We are not a bluesign System Partner. Can we still make a bluepass ingredient claim?

A brand does not have to be a bluesign System Partner to carry ingredient labeling, but it cannot initiate the claim on its own. A System Partner manufacturer or chemical supplier can authorize a non-partner brand to use the supplier's ingredient labeling on a finished product. The supplier drives the arrangement and either:

- prepares the label or hangtag for the certified component and provides it to the brand, or
- authorizes the brand to use the supplier's bluesign Guide ID to declare the component in its own communication, with bluesign informed which brand is authorized and for how many products.

In both cases, the certified component must be clearly named and its bluesign Guide ID included.

Whole-product bluepass claims are different: a brand making a whole-product claim does need to be a System Partner.

Q46. [Brands] If a product contains three certified materials, do we need to list all the IDs?

No. Listing the certification IDs of each material is not required. You can simply state that the product is made with the certified materials, for example by naming the three bluepass-certified components. IDs can be included if you want to, but they are not required by law or by the bluepass system at this time.

Q47. [Brands] Some product variants contain certified components and some do not. How do we handle this?

Apply a whole-product mark only to variants that meet the certification thresholds. Where certification status or material composition differs between variants, bluesign advises against ingredient-level communication that does not distinguish between them, since it can mislead consumers about which variants are certified.

Use variant-specific labeling or variant-specific product page copy so the claim matches the actual certification status of each variant.

07

Chemical product specifics

For chemical suppliers labeling bluepass chemical products.

07 Chemical product specifics

Q48. [Chemical suppliers] What is the approved claim for a chemical product?

The approved full claim for a chemical product label is:

“To help reduce adverse impact on people and the planet, this chemical product was produced through processes that meet bluesign Criteria for product stewardship, resource productivity, environmental protection, worker and social responsibility, including management system requirements.”

As with the other marks, the simplified format (bluepass mark plus QR code only) is acceptable where the full claim does not fit.

Q49. [Chemical suppliers] Can we include our commercial product name on the chemical product label?

Yes. You can include the commercial name of the chemical product, for example ‘bluepass [product name],’ ‘bluepass dye,’ or ‘bluepass water repellent.’ Placement of your product name on the label is your choice. The fixed elements are the bluepass mark and the QR code.

Q50. [Chemical suppliers] We cannot print the chemical product label in color. Is a monochrome version available?

Yes. The simplified label is provided in monochrome (single-color) versions alongside the full-color version, so partners and their printers can produce it correctly. The monochrome version is part of the standard asset package, not a later addition.

Q51. [Chemical suppliers] Our chemical product packaging is small. What are our options?

For space-constrained packaging, use the simplified label format (the bluepass mark plus QR code only), which is more compact than the full label. The round mark can also be placed on a rectangular label background where that suits your packaging.

Specific minimum sizes, color requirements, label dimensions, and material recommendations are covered in a separate visual and operational guideline that

accompanies the asset package. For a specific packaging constraint, contact bluesign so the right approach can be confirmed.

Q52. [Chemical suppliers] What about chemical products already at our customers' sites with the old label?

No relabeling is required. Chemical products already in the distribution chain with the bluesign® APPROVED label do not need to be relabeled. The material is unchanged; only the label nomenclature has changed. New production should move to the bluepass chemical product mark, with a recommended transition by the end of 2026.

Q53. [Chemical suppliers] Are chemical product labels in ECGT scope?

No. B2B chemical product labels are not within ECGT consumer-facing claims scope. Where a chemical product ends up in a finished consumer good, the brand or converter placing that product on the EU market is responsible for the consumer-facing label. A chemical product can also appear as ingredient labeling on a consumer-facing product (see Section 6).

Q54. [Chemical suppliers] Our B2B packaging never carried the bluesign mark. Do we need to add bluepass?

No. If a B2B product does not currently display a bluesign mark, there is no requirement to add the bluepass mark. For B2B, applying the mark is optional. You are welcome to use it, and bluesign is glad to see it, but it is not required.

08

Assets, artwork, and translations

What you receive, when, and how to request what you need.

08 Assets, artwork, and translations

Q55. [All audiences] When will the asset package be distributed, and what is in it?

The asset package is distributed on 22 May 2026 by email from info@bluesign.com to the on-record partner and client list. It will be available at bluesign.com/partner-resources

The package includes:

- The bluepass Labels & Claims Guide (V2.0), the evergreen reference, with links to production files.
- The bluepass Transition Guideline (V1.0), covering timelines and ECGT references.
- Label artwork and templates for the recommended and simplified formats, in color and monochrome.

Q56. [All audiences] What file formats are the label assets provided in?

Label files are provided in four color modes so you can match the file to the intended use: CMYK for four-color printing, Pantone Coated for Pantone print on coated paper, Pantone Uncoated for Pantone print on uncoated paper, and RGB for digital use only.

For the consumer product hangtag, double-sided and one-sided options are provided. Print files contain a print layer and a cut path layer; digital files contain a single layer. The artwork on these layers must not be modified.

Q57. [Brands] Can we modify the bluepass mark artwork for our own brand identity?

No. The bluepass mark artwork cannot be altered, in any version. Use of the mark is governed by the System Partnership agreement, and consistency is what allows the mark to function as a certification mark.

What you can do: choose between the full-color and monochrome versions provided, choose the recommended or simplified format, and place the round mark within a rectangular label layout using the templates provided.

Q58. [All audiences] Does bluesign provide translated versions of the claim?

Not at this time. bluesign does not currently provide approved translated versions of the text claims. The claim is provided in English.

If you need a translation for a specific market, contact info@bluesign.com so the wording can be reviewed together before use. bluesign is working on translated materials for some markets; these are not yet available.

Q59. [Brands] Does the claim have to be in the local language of each market?

The guiding principle is that an average consumer should be able to understand the claim. Whether every claim must be translated into the language of each destination country is not yet fully settled. An English-language label is considered workable for now.

If you intend to sell into a market where you believe a local-language claim is needed, contact bluesign. Any translation should be reviewed with bluesign before it is used, so the wording stays consistent and substantiated.

Q60. [Chemical suppliers] Where do we obtain our chemical product ID and QR code?

Your chemical product ID is the bluesign Finder entry for your product, and a QR code can be generated to link to it. For the specific steps to obtain your ID and QR code, contact your bluesign chemical department representative, who can guide you through the process.

Q61. [All audiences] Where can we find this FAQ and the related guidelines after the webinar?

This FAQ, the Labels & Claims Guide (V2.0), the Transition Guideline (V1.0), and the asset package are distributed by email from info@bluesign.com on 22 May 2026. It will be available at bluesign.com/partner-resources

09

Costs, vendors, and operations

Practical questions about producing labels and who is responsible for what.

09 Costs, vendors, and operations

Q62. [Brands] Will bluesign cover the cost of relabeling, replacement hangtags, or wasted label stock?

bluesign provides the artwork, label templates, and approved claims at no additional cost. Physical production of hangtags and labels (printing, materials, labor) is the responsibility of the partner and its manufacturing partners. The 27 September 2026 deadline is set by ECGT, not by bluesign.

Practical ways to reduce relabeling cost:

- For existing inventory with sewn-in labels and no claim text, no action is needed.
- For hangtags carrying an existing QR code, redirect the QR destination to bluesign.com/verify (see Q26).
- Cover existing old-claim hangtags with a sticker rather than reprinting.

Q63. [Brands] Does bluesign provide finished hangtags to brands or factories directly?

No. bluesign provides artwork, templates, and approved claims. Production of physical hangtags is the responsibility of partners and their manufacturing partners. This is consistent with how the bluesign marks have been managed historically. For printing specifications that a vendor needs to meet, refer to the visual and operational guideline accompanying the asset package, or contact bluesign.

Q64. [Brands] Do brands coordinate relabeling with their manufacturing partners, or does bluesign handle it?

Brands coordinate directly with their manufacturing and distribution partners on label updates. bluesign does not have a contractual relationship with a brand's manufacturers regarding hangtag production. Commercial terms are between the brand and its partners.

Q65. [All audiences] How are existing certifications affected? Do we need to re-apply?

No. Existing certifications carry over to the new mark. The certification process, the bluesign Criteria, and the assessment are all unchanged. Only the mark name and claim language have changed. In short:

- bluesign® PRODUCT becomes bluepass consumer product.
- bluesign® APPROVED (article) becomes bluepass article.
- bluesign® APPROVED (chemical) becomes bluepass chemical product.

Manufacturers and chemical suppliers do not need to do anything inside the bluesign System: products remain listed on the bluesign Guide and the bluesign Finder as before. The only change is the label mark and the claim language.

10

Accreditation and the regulatory backdrop

How bluepass fits within ECGT and trademark regulation.

10 Accreditation and the regulatory backdrop

Q66. [All audiences] Why was bluepass created? Why could the bluesign® marks not continue?

Two regulatory developments made the change necessary:

- **Trademark regulation.** Under trademark regulation that applies to certification schemes, the name of the certification mark on a product cannot be the same as the name of the organization that owns and manages the scheme. bluesign is the scheme owner, so the certification mark needs its own distinct name. That mark is bluepass.
- **Clearer expectations for substantiated claims.** Claims on consumer-facing products increasingly need to be substantiated with accessible evidence. The bluepass mark, the approved claim text, and the QR code to a bluesign-controlled verification page work together to provide that.

bluepass was registered as the new certification mark of the bluesign System and approved for Europe in 2026.

Q67. [All audiences] How does bluepass qualify as a certification scheme under ECGT?

ECGT (the Empowering Consumers for the Green Transition Directive) targets unsubstantiated sustainability claims by requiring that any claim on a consumer-facing product be backed by clear, accessible evidence. The bluepass system is bluesign's response: it gives partners a verifiable claim, an accessible substantiation path through the QR code, and a clear distinction between the certification mark and the organization that manages it. The development of the framework included consultation with bluesign's legal department and an independent assurance and accreditation organization.

Q68. [Brands] Who certifies bluepass? It looks like bluesign certifies itself.

The certification mark (bluepass) and the scheme owner (bluesign) are kept separate, as trademark regulation requires. The line 'Certified by bluesign technologies ag' on the label identifies the certifying organization, which is structurally distinct from the certification mark. bluesign performs the verification itself: the bluesign System is the certification scheme, and bluesign carries out the on-site assessment. Keeping the scheme owner name separate from the mark name makes clear to consumers and regulators that an independent scheme stands behind the mark.

Q69. [All audiences] What is the risk of using an old or unsubstantiated claim?

A claim on a consumer-facing product in the EU that is misleading or unsubstantiated may lead to a fine, with penalties defined at member-state level. Enforcement of ECGT is handled by national consumer protection authorities, and interpretation can vary between markets. The bluepass system is designed to give partners a claim that is clear, consistent, and substantiated, which reduces that risk. Responsibility for the claim sits with the company placing the product on the market, so partners should also validate their approach with their own legal counsel.

11

Retailers, e-commerce, and corporate communication

How bluepass shows up beyond the product itself.

11 Retailers, e-commerce, and corporate communication

Q70. [Brands] How can a retailer verify that a brand's bluepass claim is valid?

Retailers can use the verification page at bluesign.com/verify, which is the authoritative reference. For article-level checks, the page links through to the bluesign Guide (bluesignguide.com); for chemical products, to the bluesign Finder (bluesignfinder.com). bluesign is also building out the verification page to include lists of labeled products and of brands that label, so retailers will have a single reference point for product-level verification.

Q71. [Brands] Do we need to update each product page on our e-commerce site?

All product-related digital communication referencing bluesign certification should move to the approved bluepass claims and mark, aligned with the physical label. This applies to product detail pages, category pages, and marketing copy.

In digital channels, the claim can be substantiated in the way that fits the format: a QR code, the bluepass mark as an active link to bluesign.com/verify, or a visible link to the verification page. A pop-up or expandable panel that shows the approved claim when a shopper selects the bluepass mark is a common and effective pattern on product pages.

Q72. [Brands] Which term do we use in our sustainability report, bluesign product or bluepass?

It depends which year your sustainability report covers:

- **FY 2025 (published in 2026):** use 'bluesign product.'
- **FY 2026 (published in 2027):** you can use either 'bluesign product' or 'bluepass Consumer Product,' since this is a year of transition.
- **FY 2027 and beyond:** use 'bluepass Consumer Product.'

Q73. [All audiences] Is bluesign System Partner communication affected by the move to bluepass?

No. bluesign System Partner communication describes a company's partnership with bluesign, not a certified product. It is not affected by the move to bluepass. The existing bluesign System Partner logo and the guidance issued for it remain valid, and you can

continue to use them on brochures, presentations, websites, and other marketing materials as before.

Dedicated guidance for System Partner communication is provided separately from the Labels & Claims Guide, since it is not an on-product label. If you have a specific question about System Partner communication, contact bluesign.

Q74. [All audiences] What is bluesign doing to help consumers understand the new mark?

The verification page at bluesign.com/verify is the first step: it gives any consumer a clear, accessible explanation of what bluepass means and how the bluesign System works. bluesign has built B2B awareness of the bluesign brand over recent years and is now extending that to consumers, with the verification page as the foundation and further consumer-facing activity planned. This supports partners by helping end consumers recognize and understand the bluepass mark.

Contact

For questions not covered in this FAQ, the Labels & Claims Guide, or the Transition Guideline, or for any situation specific to your business, contact bluesign. Partners with a unique situation are encouraged to get in touch directly so a workable solution can be found.

Contact your bluesign representative directly, or email info@bluesign.com.

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Related documents

- **bluepass Labels & Claims Guide (V2.0)**: the evergreen reference for the bluepass system, marks, claims, label structure, and terminology.
- **bluepass Transition Guideline (V1.0)**: the time-sensitive companion covering compliance dates, transition steps, and what to do with existing label stock.

Both documents are distributed with the asset package and are available at bluesign.com/partner-resources by request at info@bluesign.com.

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