



bluesign

bluepass
Transition
Guideline
for ECGT & Beyond

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How to use this document

This is the time-sensitive companion to the bluepass Certification Mark & Claims Guideline.

Use the Main Guideline for evergreen reference on what bluepass is and how to use the marks and claims.

Use this Transition Guideline to understand what you need to do, by when, and how to handle products and labels already in motion.

If you only have time for one page, turn to page 5 to find the section that applies to your business.

01

The Regulatory Backdrop

Short, factual context. Why bluepass exists and what enforcement looks like.

The ECGT Directive

The EU Empowering Consumers for the Green Transition (ECGT) directive applies from September 27, 2026 to all consumer-facing products sold in the EU. It targets unsubstantiated sustainability claims by requiring that any environmental claim on a consumer-facing product label be backed by clear, accessible evidence.

The bluepass system is bluesign's response to ECGT. The bluepass mark, approved text claim, and QR code linking to bluesign.com/verify together provide the substantiation ECGT requires.

ECGT applies to consumer-facing claims on products sold in the EU. It does not apply to B2B communication, internal documentation, or products sold outside the EU.

What Enforcement Looks Like

Enforcement of ECGT is carried out by national consumer protection authorities in each EU member state. Penalties for non-compliance are defined at the member state level.

In practice, enforcement is most likely to focus on market surveillance by national authorities and specialist consumer protection lawyers. Recall of products already on the market or destruction of existing inventory is unlikely. Fines and corrective action are the most probable outcomes for non-compliant labels.

bluesign's role

bluesign is not the enforcement body. The compliance responsibility sits with the brand or company placing the product on the market. The bluepass system, used as recommended, is designed to support partners in meeting their compliance obligations.

02

Find Your Path

Three audiences, three transition paths. Find yours below.

If you fit more than one category — for example, a brand that also operates as a manufacturer — your products fall under more than one mark. Read all sections that apply.

<p>FOR BRANDS</p> <p>Consumer-facing products</p> <p>You sell finished consumer products in the EU. ECGT compliance applies most directly to you.</p> <p>Key date: September 27, 2026 — ECGT compliance deadline for consumer-facing claims on EU products</p> <p>→ Go to page 7</p>	<p>FOR MANUFACTURERS</p> <p>Articles (B2B)</p> <p>You produce articles (fabrics, accessories, trims). ECGT generally does not apply to your B2B labels.</p> <p>Key date: End of 2026 — recommended Trademark Regulation transition for B2B labels</p> <p>→ Go to page 9</p>	<p>FOR CHEMICAL SUPPLIERS</p> <p>Chemical products (B2B)</p> <p>You supply chemical products listed on the bluesign Finder. ECGT does not apply to your B2B labels.</p> <p>Key date: End of 2026 — recommended Trademark Regulation transition for B2B labels</p> <p>→ Go to page 10</p>
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03

Key Dates at a Glance

When things happen and what each date means.

Date	What happens
Now	bluepass marks and claims are available for use. Both the recommended label format (full label) and the acceptable format (mark + QR code) are valid. Partners can begin transitioning at any time.
September 27, 2026	ECGT compliance deadline. From this date, all consumer-facing claims on products sold in the EU need to meet ECGT substantiation requirements. The bluepass system, used as recommended, meets these requirements.
End of 2026	Recommended Trademark Regulation transition for B2B labelling on articles and chemical products. Manufacturers and chemical suppliers transition to bluepass marks at their next label production cycle.
End of 2027	Recommended Trademark Regulation transition complete for consumer-facing bluepass marks. Brands transition to bluepass marks at their next label production cycle.

04

For Brands

Consumer-facing products in the EU. Your transition path.

Your Transition Path

If you sell finished consumer products in the EU, ECGT compliance applies to your consumer-facing labels from September 27, 2026.

There are three label options available to you during the transition. All three point consumers to the same bluesign-controlled landing page (bluesign.com/verify) where the full claim is substantiated.

Solution 1	Solution 2	Solution 3
<p style="text-align: center;">Transitional</p> <p style="text-align: center;">Existing bluesign® PRODUCT label + QR code linking to bluesign.com/verify</p> <div style="text-align: center;">  </div>	<p style="text-align: center;">Acceptable</p> <p style="text-align: center;">bluepass mark + QR code only</p> <div style="text-align: center;">  </div>	<p style="text-align: center;">Recommended</p> <p style="text-align: center;">Full bluepass Consumer Product (mark + text claim + QR + 'Certified by' line)</p> <div style="text-align: center;">  </div>
<p>Useful if you have existing label stock you want to use through. Add a QR code that links to bluesign.com/verify.</p>	<p>Flexible option for partners with space constraints. The QR code substantiates the full claim when scanned.</p>	<p>The most thorough option. The full claim language appears on the product itself, plus the QR code for additional substantiation.</p>
<p>Compliance window: until next label production cycle, or end of 2027 at the latest.</p>	<p>Acceptable from now onward. No expiry.</p>	<p>Acceptable from now onward. No expiry.</p>

Products Already in Distribution

The ECGT directive applies to consumer-facing environmental claims from September 27, 2026, including on products already in distribution. In practice, enforcement authorities are expected to take into account

whether traders have made reasonable efforts to comply. Large-scale recalls or destruction of existing inventory are considered unlikely.

What we recommend for inventory

For sewn-in labels without claim text or QR code: no action needed. The bluesign.com website explains the meaning of these labels for consumers who search.

For hangtags with old claim text on products already in distribution: cover with a sticker that includes the bluepass mark and QR code, or replace the hangtag with one of the three solutions above.

For new production starting now: move to the recommended or acceptable label format. Solution 1 (transitional) can also be used until your next label production cycle.

05

For Manufacturers

Articles (fabrics, accessories, trims). Your transition path.

If you produce articles (fabrics, accessories, trims) and your customers are brands and converters, the ECGT directive generally does not apply directly to your B2B labels. Your transition timeline is driven by Trademark Regulation, which recommends moving from the bluesign® APPROVED mark to the bluepass article mark by the end of 2026, or at your next label production cycle.

Your Label Options

Recommended	Acceptable
<p>Full bluepass article label</p> <p>Mark + text claim + QR code + 'Certified by' line. Most useful when articles are referenced in B2B documentation that may later be shared with brands or buyers subject to ECGT.</p>	<p>bluepass mark + QR code</p> <p>More flexible option for space-constrained labelling. The QR code substantiates the full claim when scanned.</p>

During the transition

Your existing bluesign® APPROVED-labelled articles remain valid. There is no need to recall existing inventory or relabel articles already in your customers' supply chains.

If you also produce articles that end up directly on consumer-facing labels (e.g., visible logos on outerwear linings), coordinate with your brand customers to align on the consumer-facing label approach.

06

For Chemical Suppliers

Chemical products. Your transition path.

If you supply chemical products listed on the bluesign Finder (bluesignfinder.com), the ECGT directive does not apply to your B2B labels. Your transition timeline is driven by Trademark Regulation, which recommends moving from the bluesign® APPROVED mark to the bluepass chemical product mark by the end of 2026, or at your next label production cycle.

Your Label Options

Recommended	Acceptable
<p>Full bluepass Chemical Product label</p> <p>Mark + text claim + QR code + 'Certified by' line. The most thorough option for B2B documentation and digital records.</p>	<p>bluepass mark + QR code</p> <p>Useful for smaller packaging or simplified documentation. The QR code substantiates the full claim when scanned.</p>

During the transition

Your existing bluesign® APPROVED-labelled chemical products remain valid. There is no need to recall existing inventory.

07

Existing Labels & Inventory

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

Existing labels using the bluesign® PRODUCT and bluesign® APPROVED marks remain valid during the transition. The recommended approach below covers the most common situations partners are managing right now.

Situation	Recommended approach
Existing inventory with sewn-in labels (no claim, no QR code)	No action needed. The bluesign.com website explains the validity of these labels for consumers who search.
Existing inventory with hangtags carrying claim text	<p>If sold in the EU after September 27, 2026: cover the hangtag with a sticker that includes the bluepass mark and a QR code, or replace the hangtag with one of the three solutions from page 8.</p> <p>If sold outside the EU: no action needed.</p>
Existing label stock you want to use through	Brands: use Solution 1 (transitional) — add a QR code to your existing bluesign® PRODUCT label until your next label production cycle.

	<p>Manufacturers and chemical suppliers: continue using existing labels until your next production cycle, then switch to bluepass.</p>
<p>Products in transit or already at retail</p>	<p>Document a reasonable-effort compliance approach. ECGT enforcement is expected to take reasonable-effort considerations into account. Contact your bluesign Brand Services representative for case-by-case guidance if needed.</p>
<p>Products sold outside the EU</p>	<p>ECGT does not apply. Continue using current labels until your next production cycle, then switch to bluepass to align globally with the new mark.</p>

08

Contact

Talk to us. We are here to help.

For transition-specific questions

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

bluesign technologies ag

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Related documents

bluepass Labels & Claims Guideline (V2.0) — the evergreen reference for the bluepass system, marks, and claims.

bluepass FAQ — detailed answers to the most common partner questions.

Label Production Files

All documents and assets are available at bluesign.com/partner-resources