

GLOBAL
**DESTINATION
SUSTAINABILITY
MOVEMENT**

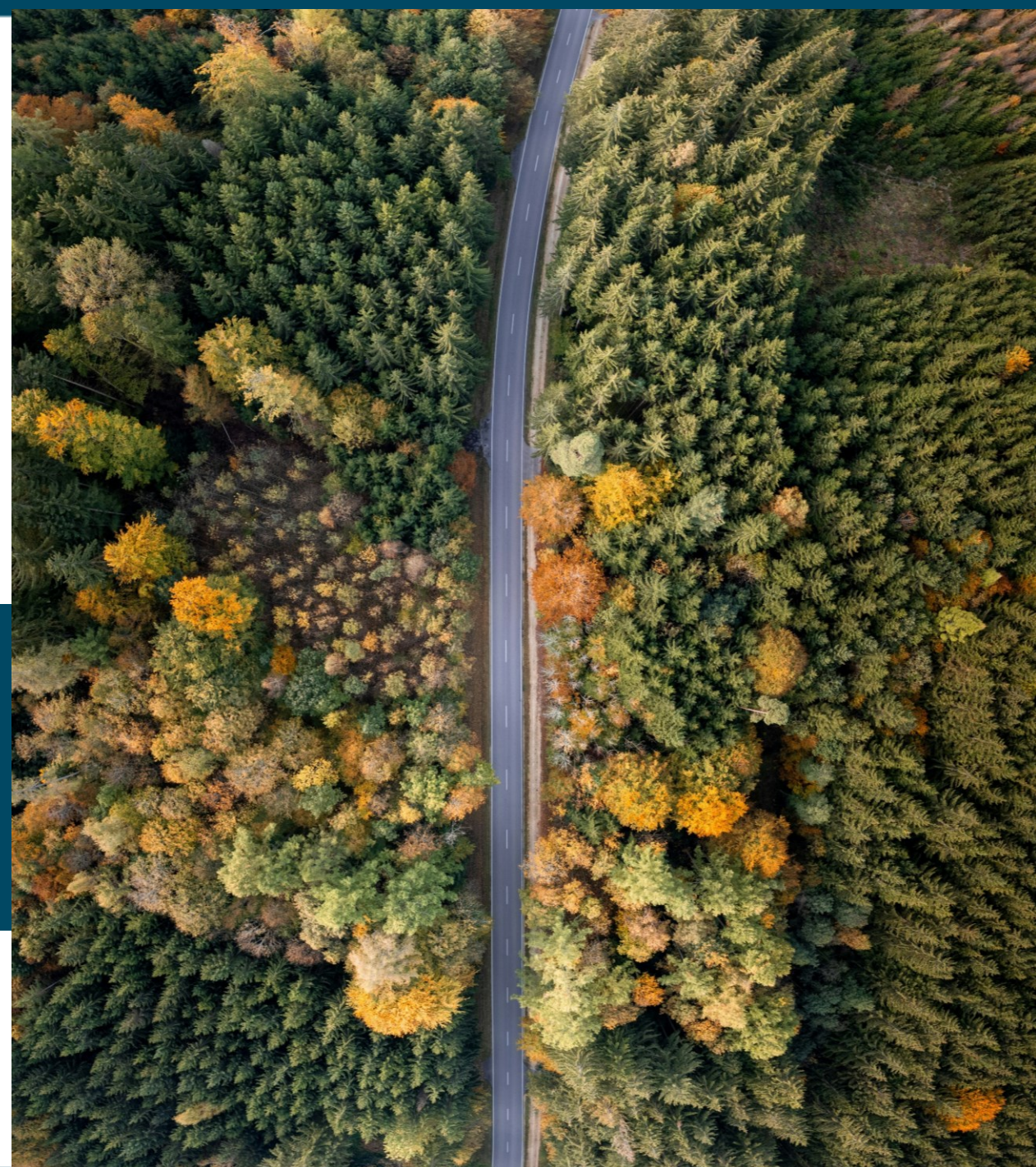
**EUROPEAN
TRAVEL
COMMISSION**



NECSTouR
European Regions for
Competitive and Sustainable Tourism

EU Empowering Consumers Directive: an updated Guide for Destinations

Feeling the Pulse – April 2026



The Experts



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Teodora Marinska

COO and Head of Public Affairs
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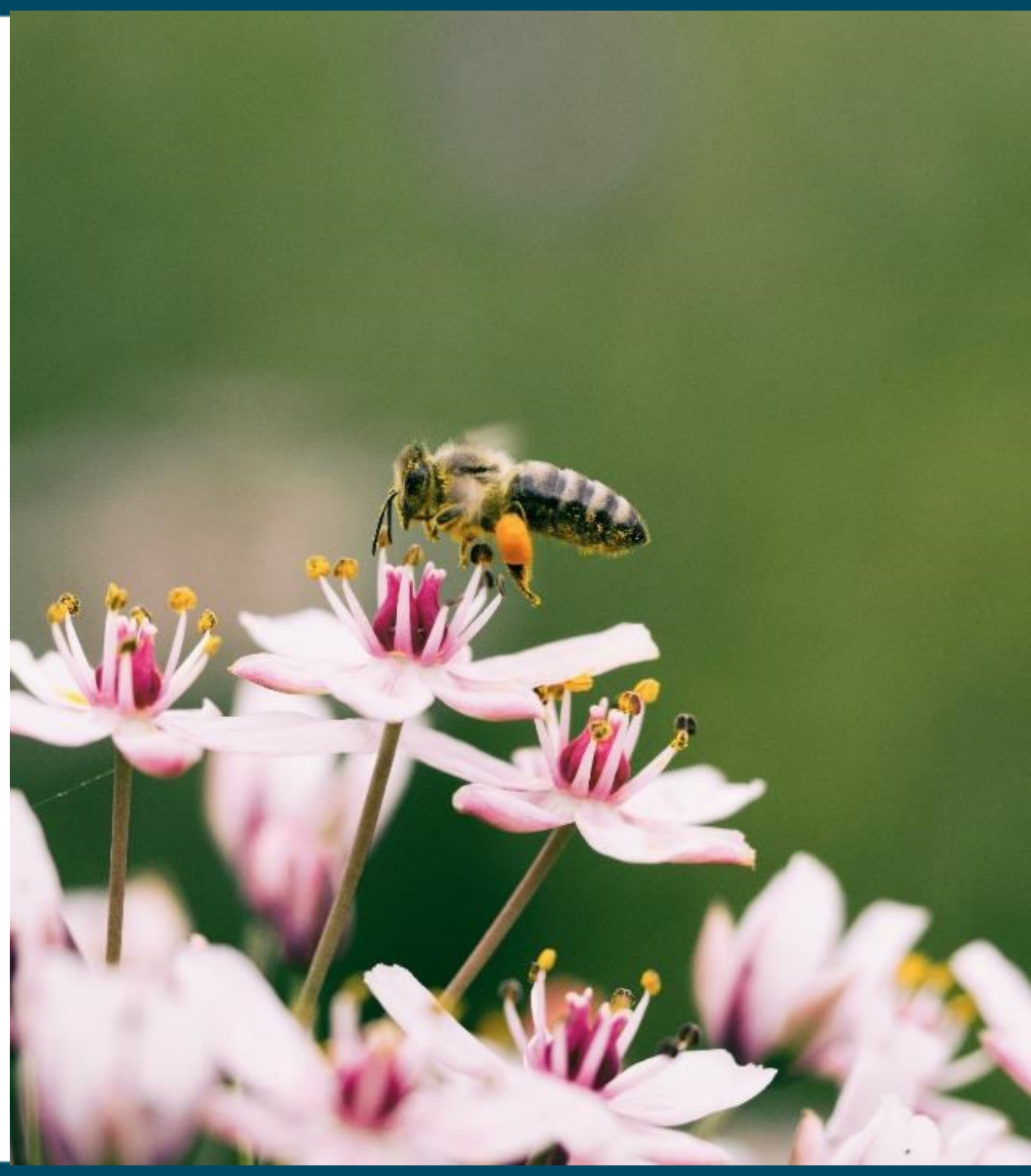


Liisa Kokkarinen

Head of Sustainable Development
Visit Finland

Agenda

- 1 Welcome and Introduction
- 2 European Travel Commission
- 3 The Updated Guide to EmpCo
- 4 EmpCo and the Certification Landscape
- 5 Q&A
- 6 Visit Finland's approach to EmpCo
- 7 Q&A





GLOBAL
DESTINATION
SUSTAINABILITY
MOVEMENT

The GDS-Movement is a data-driven international change agency that acts to catalyse socio-economic and environmental transformation in events, cities and regions across the world.



Our Services



GDS-Index

Benchmarking destinations and leveraging data to drive performance and impact



GDS-Consulting

Facilitating strategies, narratives, and innovation for destinations & events (for the visitor economy)



GDS-Academy

Educating and developing changemakers



GDS-Forum

Building a dynamic, collaborative global community

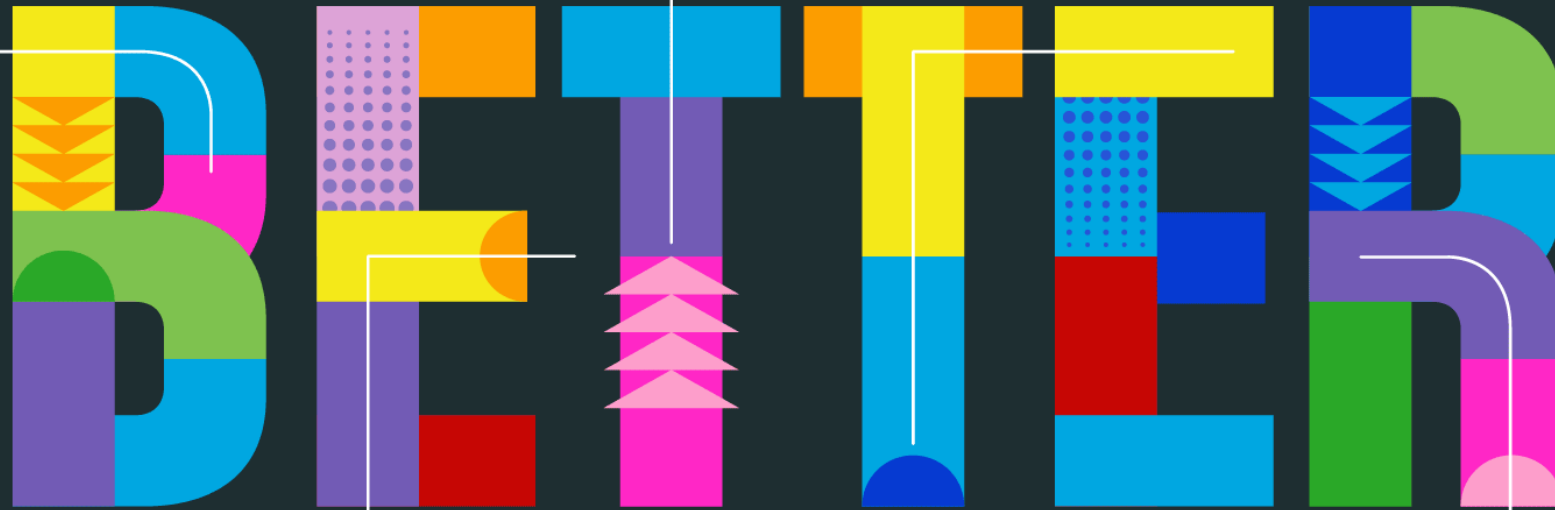


GDS-Insights

Researching trends to uncover and define next practices

GDS-FORUM &

IMPACT DAY



TOGETHER

16 – 18 June 2026
Szczecin, Poland



What is the GDS-Forum?

The GDS-Forum is where destination leaders and changemakers come together to solve real challenges in tourism and events.

It is an **unconference**. Participants do not attend to listen or read PowerPoints. They come to contribute, challenge, and create.

Sessions are engineered for collaboration, problem-solving, action and fun. Every participant is both a learner and a contributor.

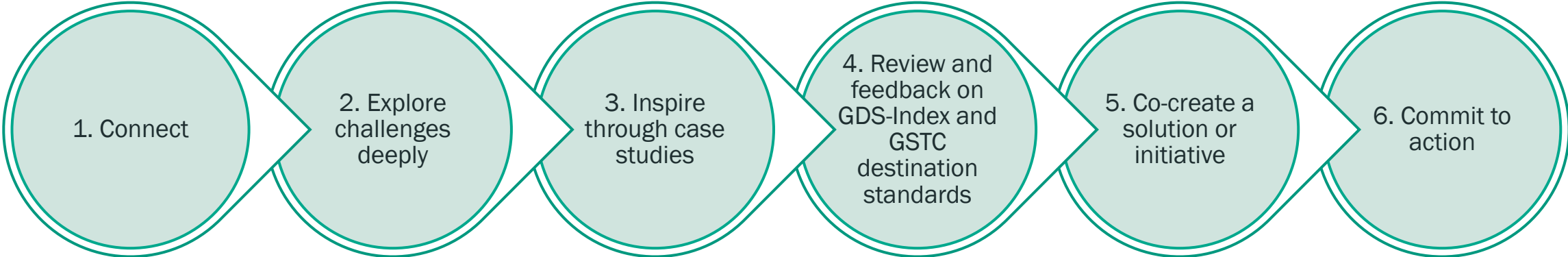
The GDS-Forum is built as a connected journey, where insights build, ideas evolve, and participants leave more capable, connected, and inspired to lead.



The Phase Journey

DAY 1

DAY 2



No PowerPoint

No Keynotes

No Panels

No Spectators



Challenge Labs And Case Studies

1. Managing Visitor Pressure and Destination Balance

2. Climate Action and Adaptation for Destinations

3. Impact Measurement, Claims and Accountability

4. Data-Powered Regeneration

5. Co-Creation, Governance, and Shared Power

6. Redesigning Food Systems for Destinations

7. Storytelling and Behaviour Change for Regenerative Destinations

8. Designing for Regeneration

9. Sustainability Certification and Standards

10. Circular Economy in Tourism and Events

11. Financing Impact and Innovation

12. Diversity, Equity, and Inclusion in Destination Development



***The Bright Spot* discount ends on 1 May. Register soon!**

Programme, registration and more details at
www.gds.earth/forum-impact-day-2026

See you in Szczecin!



First, We Have Two Quick Questions

 Vote in the Zoom Poll!

How familiar are you with the EU Empowering Consumers Directive (EmpCo)?

From 1 to 5, with
1 = not aware at all
5 = indepth understanding



First, We Have Two Quick Questions

 Vote in the Zoom Poll!

How confident do you feel about your own and/or your organisation's ability to prepare for EmpCo legislation?

From 1 to 5, with
1 = not confident at all
5 = extremely confident



The logo for the European Travel Commission, featuring the words "EUROPEAN", "TRAVEL", and "COMMISSION" stacked vertically in a bold, sans-serif font, with a vertical line to the left of the text.

EUROPEAN
TRAVEL
COMMISSION

Introduction - European Travel Commission

Teodora Marinska
COO and Head of Public Affairs
European Travel Commission



The Updated Guide to EmpCo for Destinations

Antonia Alomar
EU Projects and Public Policy Manager
GDS-Movement



(Misleading) Green Claims Are Everywhere



"Fly guilt-free to paradise! Our flights are 100% eco-friendly."



"Stay at our luxury resort and save the planet."



"Carbon-neutral cruises across the Mediterranean."



"Explore untouched nature with zero impact adventures."



"Book now! Every holiday package is sustainable."



"Drive our SUVs through the mountains for an eco escape."



"The world's most sustainable island holiday."



"Host your next event with us — the climate-neutral venue for unforgettable experiences."

Your clients are sceptical

32%

Doubt the authenticity of
sustainable products and
initiatives.

Trip.com Sustainable Travel Consumer Report

2024



Rise of Greenwashing

The EU found that 53% of green claims were vague, misleading or unfounded, and 40% were unsubstantiated
(2020 EU Research)

Regulation is Happening Globally

Examples

Canada - C59 Competition Act

United Kingdom – Green Claims Code (CMA)

Australia – ACCC Greenwashing Enforcement

Japan – Green Claims Guidelines

Singapore – Advertising Standards Authority
(ASAS)



Proof, Not Promises Practical Guide to EmpCo



Published by the **GDS-Movement** in collaboration with the **European Travel Commission (ETC)** and **NECSTouR**.

It aims to help tourism and events professionals understand the EU Empowering Consumers Directive.

Update to the previous report
"A Destination's Guide to the New EU Sustainability Regulations."



Scan to download or go to
www.gds.earth/white-papers



What the Guide Offers



- 1. Translates the EmpCo into actionable insights for the tourism and events sectors.
- 2. Provides clear, practical guidance for compliance
- 3. Supports risk management and builds resilience
- 4. Provides insights to reduce greenwashing and avoid "greenhushing"
- 5. Highlights new opportunities for sustainability communication

What is EmpCo?

- Designed to protect consumers from misleading environmental claims and labels.
- Member States were required to transpose it by **27 March**.
- The Directive will apply from **27 September**.
- Amends the Unfair Commercial Practices Directive 2005/29/EC¹ and the Consumer Rights Directive 2011/83/EU²



How the Directive will be Applied in Practice



Claims must be clear and not misleading

Claims must be substantiated and verifiable

Generic environmental claims are restricted

Future environmental claims must be credible

Scope must be accurate and proportionate

Labels and certifications must be credible

Visual and implicit claims are in scope

Enforcement powers are strengthened

What is a Claim?

- **Text:** Slogans, product descriptions, website copy.
- **Pictorial elements:** Images, infographics.
- **Graphic elements:** Logos, symbols, icons.
- **Symbolic representations:** Labels, certifications.
- **Brand elements:** Brand names, company names, product names themselves.



Golden Rules: From vague to specific



**Bad
claim**

“Our hotel is
the most
sustainable in
the region.”

**Better
claim**

“Our hotel
uses 100%
renewable
electricity and
reduced water
use by 30%
since 2021.”

Golden Rules: From subjective to objective and verifiable



**Bad
claim**

“Our destination is the most sustainable in Asia.”

**Better
claim**

“Ranked 13th in the Global Destination Sustainability Index 2025”

Golden Rules: From headline claims to evidence-based communication



**Bad
claim**

"Our event is net
zero."

**Better
claim**

"The event's
carbon footprint
was measured,
emissions were
reduced by 38%,
and the remaining
emissions were
offset."

Golden Rules: From partial action to accurate scope



**Bad
claim**

“Our
destination is
sustainable”

**Better
claim**

“75% of
hotels are
certified by
accredited
sustainability
schemes.”

What the Directive does not Require?



No Mandatory Schemes: Does not mandate specific certification schemes or maintain a list of approved labels/standards.

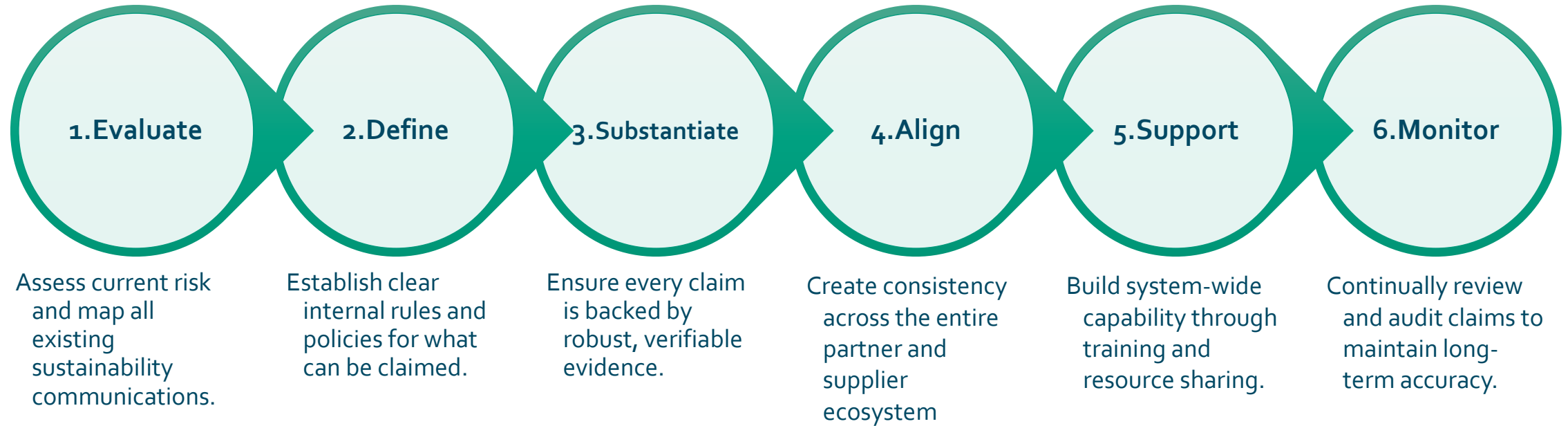


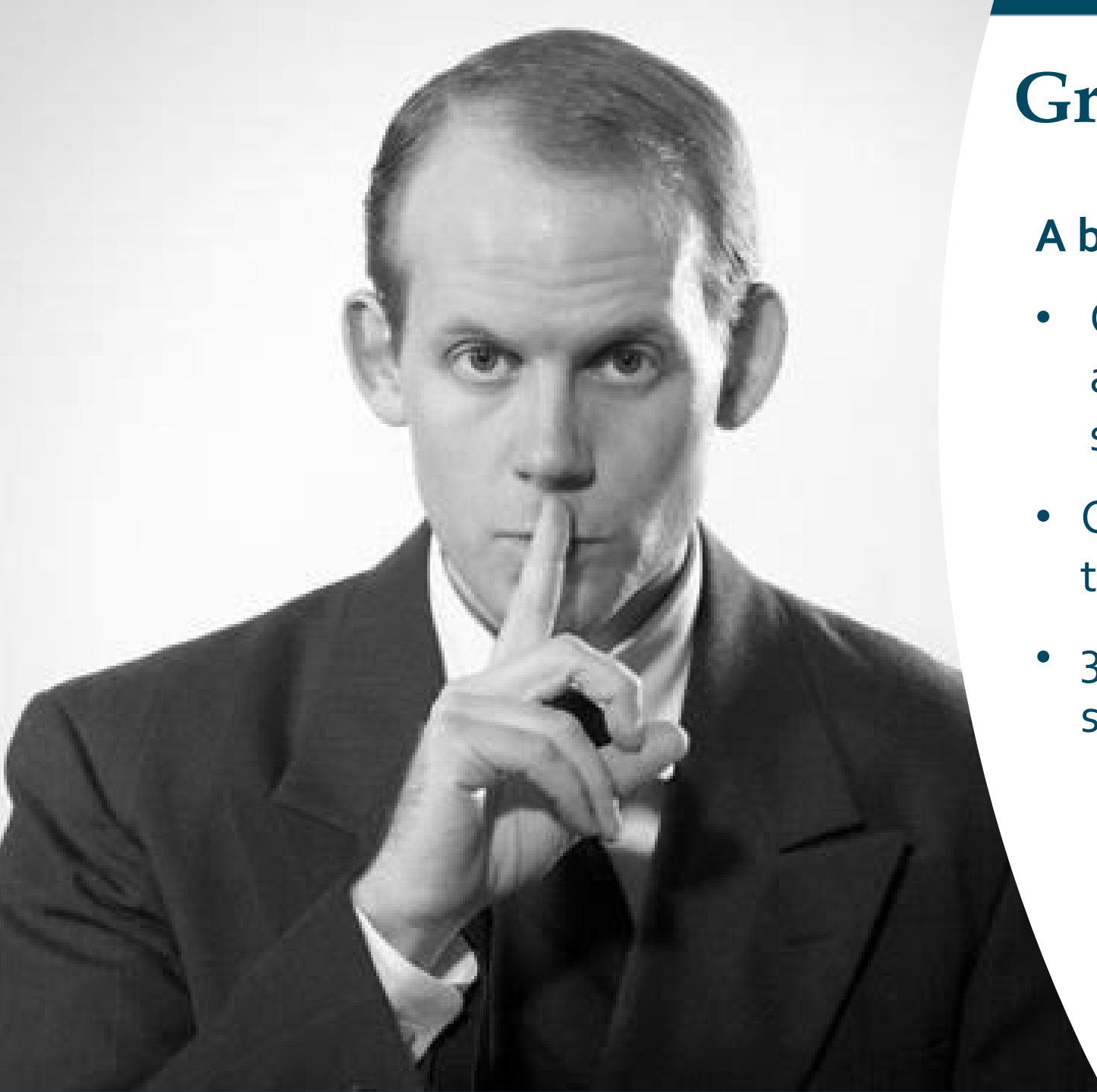
Flexibility in Tools: Does not require formal ISO accreditation or specific certification schemes.



Permitted Metrics: Does not prohibit the use of rankings, indices, or benchmarking tools.

Preparing for EmpCo: The 6 Steps to Credible Claims





Greenhushing



A big risk!

- Only 53% of destinations are talking about their sustainability efforts and strategies via their websites (GDS-Index)
- Only 19% of organizations mention their sustainability efforts (ICCA)
- 30% of hotels communicate their sustainability practices (University of Surrey)

DON'T STOP COMMUNICATING



We need to improve how we communicate and engage better



EmpCo and the Certification Landscape

Claudia Bustinza

GDS-Index Programme Manager

GDS-Movement

EmpCo is accelerating a structural shift in the certification landscape

The shift is from using certifications as symbolic endorsements →
to verifiable proof

Sustainability
claims must be
clear,
substantiated, and
verifiable

Certification
schemes are being
scrutinised against
these expectations

More rigorous,
evidence-based
models are
gaining relevance

Certification can
support credibility



"Certification is one pathway, not the only one"

What Makes Certification Credible

Governance & Access

- Open, transparent, and non-discriminatory access
- Experts and stakeholders

Verification & Enforcement

- Clear procedures for non-compliance
- Independent third-party assessment

Standards & Integrity

- Competence and impartiality
- Aligned with recognised standards

What to Watch Out

Moving from symbolic endorsements → to verifiable proof



Self-created labels lacking independent verification

Certifications with limited transparency or unclear methodologies

Broad sustainability claims based on partial criteria.

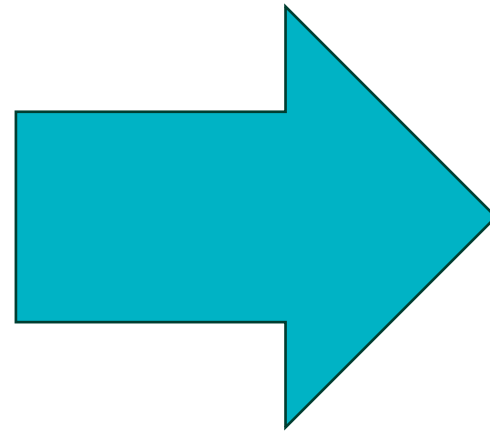
Labels that may mislead consumers

Key Shift in Certifications

How certification is being used is changing

BEFORE

- Labels
- Marketing badge
- Signals of intent



NOW

- Evidence
- Verified claims
- Independent verification

Certification is no longer about having a label, but about what that label proves

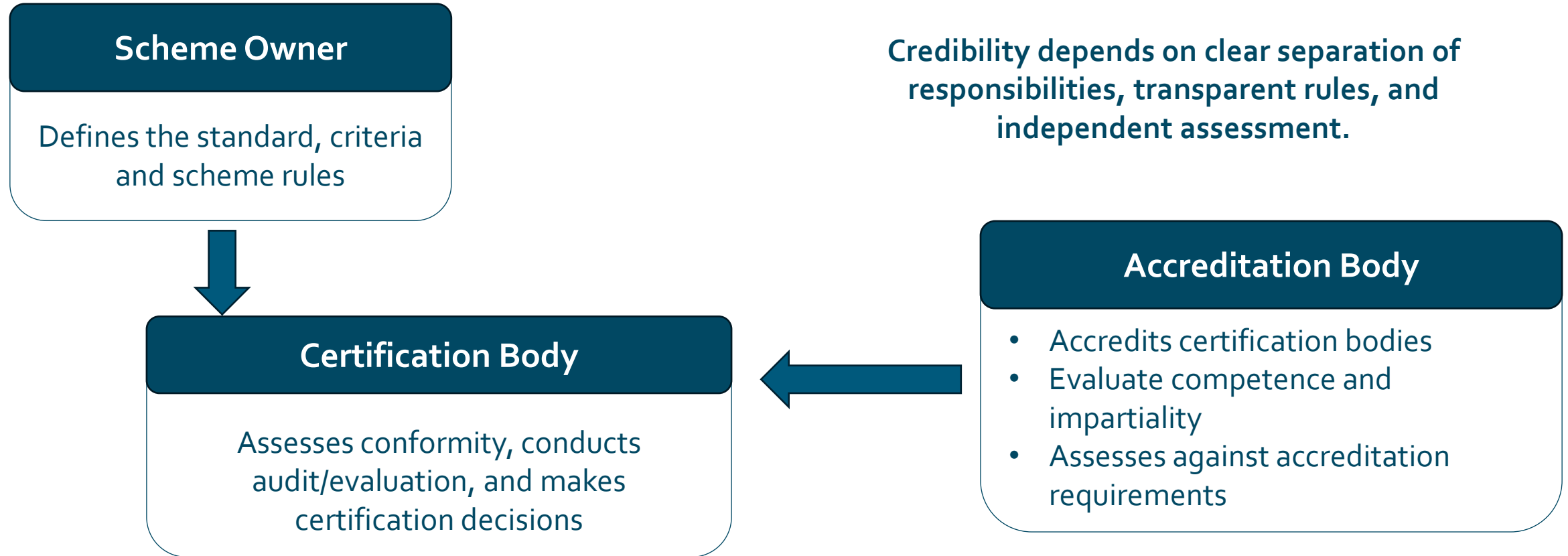
Core Principles for Credible Claims

- Be **precise** and **evidence-based**
- Define **scope** and methodology clearly
- Ensure **independent verification**
- Be ready to **substantiate claims**
- Ensure partner, supplier, and venue **claims are aligned and evidence-based.**



If a claim cannot be proven, it should not be communicated.

Sustainability Certifications: Distinct Roles, Clear Responsibilities



Travel Platforms and Sustainability Claims

Key Shift:

Platforms are shaping the market before regulation takes effect.
Compliance is becoming a competitive advantage.

Travalyst

Certification Initiative

- Publishes a transparent list of schemes declaring alignment with EmpCo
- Provides guidance to support regulatory compliance
- Improve consistency and comparability through the Data Hub

Booking.com

Sustainability Programme

- Requires recognised third-party certification
- Applies verification through platforms rules
- Increases visibility of verified properties



Implications for Destinations

- Platform recognition does not justify destination-wide claims
- Claims must align with underlying evidence

Questions?



Visit Finland's approach to EmpCo

Liisa Kokkarinen

Head of Sustainable Development
Visit Finland





Visit Finland



SUSTAINABLE
TRAVEL
FINLAND

Visit Finland's approach to EmpCo

Webinar: EU Empowering Consumers Directive: an Updated Guide for Destinations

Liisa Kokkarinen 30.4.2026

A few EmpCo approaches to consider

- *How we ensure the sustainability labels and certifications we work with, are compliant?*
- *How we provide stakeholder support, especially when the timeline is tight?*
- *How we ensure our own consumer communications is legally compliant?*





SUSTAINABLE TRAVEL FINLAND™

National sustainable tourism development programme

- Umbrella label for certifications
- Communication channel

The objectives of the STF programme

- National sustainable tourism standard;
- Strengthening sustainability competence across the sector;
- Supporting the green transition;
- Ensuring the credibility and verification of sustainability efforts & communication;
- Monitoring and measuring sector-wide sustainability performance;
- Identifying key areas for continuous improvement;
- Supporting informed decision-making by consumers and stakeholders.

→ aligns with the objectives of EmpCo!

A few EmpCo definitions to consider

- **Generic environmental claim** is a general claim that is not part of a sustainability label.
- **Sustainability label** is a voluntary label relating to the environmental or social characteristics.
 - The presentation of a sustainability label that is not based on a **certification scheme** is unfair and misleading marketing practice.
- **Certification scheme** means a third-party verification scheme that certifies that a product, process or business complies with certain requirement.
 - *It is still unclear, how to fulfil some of these requirements, especially the one related to competence!*

→ *STF forms a generic environmental claim, which is allowed if it is part of a sustainability label that is based on a certification scheme.*



So, are the certifications compliant?

- **Expected key implication:** *certification schemes become an important tool for companies to credibly and lawfully communicate sustainability-related claims to consumers.*

Be patient!

Stick with your certification.

We'll be a lot wiser in the months to come!

Will there be a list of compliant certifications?

- Under the EmpCo framework, enforcement will be handled by national consumer protection authorities, typically Consumer Ombudsmen;
 - the Consumer Ombudsman acts exclusively as an ex post supervisory authority;
 - There will be no ex ante approval or pre-validation of certification schemes by authorities;
 - Enforcement will take place only after communication has been published, on a case-by-case basis, if concerns arise.
- As an NTO is not a supervisory authority, it cannot validate or approve certification schemes on behalf of the authorities;
 - Certification schemes must therefore themselves declare and demonstrate their legal compliance.

Ecosystem in change

Lawyers

Ministries (Economic Affairs & Employment, Justice, Environment)

Authorities (Ombudsman, committees)

Certification bodies

European Commission, ETC, GDS Movement



A scenic landscape featuring rolling hills under a clear sky. In the foreground, there's a grassy field with scattered rocks. A single, gnarled tree with green leaves stands prominently on a rocky outcrop. A large, blue-outlined thought bubble is superimposed on the left side of the image, containing the text. The background shows distant, hazy hills.

Let's not be alone.
Let's prepare ourselves for
a new era of tourism
communication!

Kiitos! 

LIISA KOKKARINEN
Head of Sustainable Development
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Visit Finland



SUSTAINABLE
TRAVEL
FINLAND™

**Any Final
Comments or
Questions?**



How can the GDS-Movement support you?



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THANK YOU!

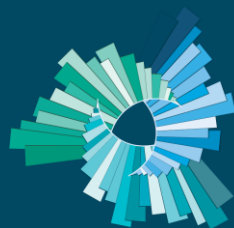
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Email: info@gds.earth

Web: www.gds.earth

LinkedIn: bit.ly/GDSM LinkedIn

YouTube: [@GDS-Movement](https://www.youtube.com/@GDS-Movement)



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