



Potential Classification of the Responsible Care® Logo as a “Sustainability Label” under Directive (EU) 2024/825: Legal Assessment and Revision of Cefic’s Logo Guidelines

What is the issue/concern and how did it arise?

The issue concerns the possibility that the Responsible Care® logo could be interpreted by national enforcement authorities as a “sustainability label” under Directive (EU) 2024/825 on empowering consumers for the green transition.

Directive (EU) 2024/825—the so-called Greenwashing Directive—restricts the use of voluntary “sustainability labels” in business-to-consumer communications unless the label has been:

- a) established by a public authority; or
- b) based on a qualifying certification scheme involving independent third-party verification.

The concern is that an enforcement authority could interpret the Responsible Care logo as a sustainability label because it may appear to distinguish or promote a company, product, service or process by reference to environmental or social characteristics. This risk becomes stronger when the logo is green, includes the phrase “Driving Safety & Sustainability,” or appears in consumer-facing marketing.

This concern was brought to Cefic’s attention by **several national chemical-industry associations**. And it was initially taken up by Cefic’s **HSSE, Responsible Care & Supply Chain Department**, working closely with Cefic’s **Legal Department**. Because the potential legal consequences were considered serious, **Cefic commissioned external legal advice from the law firm Covington**.



What were the initial internal steps taken?

On 17 June 2026, Cefic informed the Responsible Care Network of Experts (RC NoE) about the emerging legal concern. Francesca Zuccarello reportedly explained that the risk was particularly relevant where the logo appeared in potentially consumer-facing communications, including:

- publicly accessible websites;
- email signatures;
- brochures;
- other corporate or promotional communications accessible to consumers.

RC NoE members were also informed that Cefic had commissioned external legal advice and that the resulting assessment would be submitted to Cefic's Legal Forum for consideration.

Findings of Covington's legal assessment

Covington's legal assessment was subsequently completed and made available to relevant stakeholders **upon request**. Its principal findings, as summarised by Cefic, were the following.

Directive (EU) 2024/825 defines a sustainability label broadly as a voluntary trust mark, quality mark or equivalent that distinguishes and promotes a product, process or business by reference to environmental or social characteristics. Under the Directive, such a label must be established by a public authority or supported by a qualifying certification scheme involving independent third-party verification.

Covington found that the current Responsible Care programme:

- does not require independent third-party auditing or verification of all participating member companies; and
- does not provide for the withdrawal of a company's right to use the logo where that company fails to comply with the programme's requirements.

Covington therefore concluded that Responsible Care does not meet the minimum requirements of the certification-scheme model described in the Directive. The practical concern is that the logo could nevertheless be **perceived as a sustainability label**, particularly when used in consumer-facing communications, while lacking the certification structure required for such a label.

The assessment also concluded that the Directive primarily applies to **B2C communications**.



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However, implementation may differ between countries, and national rules may extend similar restrictions to B2B communications. France was cited in the correspondence as an example of a country where the relevant rules may also cover B2B communications. The documents state that enforcement of the relevant rules is expected from **27 September 2026**.

Presentation and circulation of the legal findings

On 7 July 2026, Covington presented its assessment to the Cefic Legal Forum. Following the discussion held at the Legal Forum, Cefic prepared a first draft of revised European guidelines for review by relevant groups.

The legal assessment itself was not attached in the communication regarding the draft guidelines however Cefic stated that it was available upon request. Therefore, the currently available information consists of Cefic's summary of Covington's conclusions rather than the full legal opinion.

Main measures proposed in the draft guidelines

The draft takes a cautious risk-mitigation approach. Its principal proposed visual changes are:

- discontinuing use of the green version of the Responsible Care logo;
- removing the tagline **"Driving Safety & Sustainability"**;
- using either the symbol alone or the symbol accompanied only by the words **"Responsible Care."**

The draft explains that green could be associated with environmental claims and that the word "sustainability" in the tagline could increase the possibility of the logo being interpreted as a sustainability label. New versions without the tagline had already been shared with national associations. Pages 10 and 11 of the draft visually distinguish the logo versions Cefic proposed to discontinue from the blue, black and white versions considered acceptable.

The draft would generally permit the logo in contexts clearly directed to professional or internal audiences, such as:

- restricted professional or investor-only website sections;
- internal employee communications;
- mandatory corporate sustainability reports;
- legally required reports to authorities;
- certain professional-only brochures;
- signs inside non-public company premises.



It proposes significant restrictions for:

- open-access websites and landing pages;
- product packaging;
- product advertising and marketing materials;
- technical specification sheets and safety data sheets;
- business cards, envelopes and promotional gifts;
- publicly visible signs and posters;
- any use suggesting that the logo certifies a company or product.

The draft also states that ordinary textual references to the Responsible Care initiative may continue, provided that the wording is not presented as a stand-alone trust mark and that the communication clearly explains what participation in the initiative means.

These are **draft proposals**, not yet final requirements.

Current status

As of the latest supplied correspondence, the revised guidelines remain **under consultation and have not yet received final approval**.

Cefic is currently:

- discussing the draft with the relevant stakeholders;
- collecting written comments;
- holding individual clarification calls upon request;
- working with its Legal Department to refine the wording;
- consulting ICCA and the international Responsible Care community;
- awaiting national assessments of how Directive (EU) 2024/825 will be implemented in individual jurisdictions.

National associations have been asked to examine whether their national legislation may introduce requirements that are broader or more restrictive than the minimum EU framework and to report those findings to Cefic.

Cefic has stated that it does not intend to circulate every intermediate revision, in order to avoid confusion. Instead, a newer version is expected to be distributed closer to the RC NoE meeting scheduled for **16 September 2026**.



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