INFORMATIVE — NON-NORMATIVE

EmpCo Provider Onboarding Guide

What the EmpCo scheme means for a provider —
obligations, sector fit, simplifications, and the path to a label licence.

A companion document to the EmpCo framework.
For organisations evaluating a provider pathway under EmpCo
or preparing an initial pathway validation.

Based on EmpCo v0.4.0-draft-vv (2026-07-08)
Published by the European Sustainable Food Coalition (ESFC)

Informative companion — non-normative. The EmpCo framework PDF is the authoritative document.

1. What the Scheme Is

The ESFC EmpCo Certification Scheme is a **system-level** validation/verification scheme that makes climate labels produced by validated providers compliant with EU Directive 2024/825 ("Empowering Consumers"). Instead of verifying each product claim individually, a single provider-pathway **validation** covers the entire assessment system — methodology, database, calculation engine, quality assurance, and change management. Companies using labels from a licensed provider rely on that provider's validation statement and label licence.

This model is analogous to MSC or Rainforest Alliance: the scheme owner defines the standard, an independent validation/verification body (VVB) — accredited to ISO/IEC 17029 + ISO 14065 with ISO 14067 product scope, via the Regulation (EC) No 765/2008 accreditation mechanism — validates the system once and verifies a sample of live claims annually, with each engagement conducted per ISO 14064-3. Participating companies use the labels under a **label licence** issued by the scheme's Certification Committee on the basis of the VVB's statements.

The framework itself is **methodology-neutral**. Each provider declares its specific choices (LCIA method, functional unit, rating system, claim type, LCI database, calculation engine, gap-filling logic) in a **provider pathway annex** using the canonical PA-01..09 template. The VVB validates compliance with the framework and consistency with the declared pathway.

What Gets Validated

One provider-pathway validation covers the complete assessment pipeline:

Component	Scope
LCA Methodology	ISO 14040/14044 compliant life-cycle assessment using EF 3.1 (built on IPCC AR6 GWP100 with fossil / biogenic / LULUC sub-indicators)
LCI Database	Provider-declared (background process database used to compute exchanges)
Calculation Engine	Provider-declared (tool that solves the LCI graph and applies LCIA method)
Quality Assurance	5 outcome-based requirements verified by the VVB (accuracy, reproducibility, completeness, traceability, outlier detection)
Change Management	3-tier classification with regression suite covering the provider's declared input cases

Two Assurance Levels

	Enhanced Assurance	Standard Assurance
Typical use	Per-product claims where the trader orders product-exact intake — any claim surface	Menu labels, operational reporting, B2B — and on-pack/shelf at catalogue scale (sampled)

Data	Complete primary data via supplier questionnaire	Minimum data (ingredient + quantity); gap-filling permitted
Data intake	Supplier questionnaire, enterprise data integration, or back-of-package label parsing	Recipe entry (ingredient names + quantities)
QA	Expert review or validated automated pipeline	Automated validation
Validity	24 months (questionnaire) / continuous + 24-month cap (enterprise)	Continuous (recalculated automatically)

Both levels use the provider's declared methodology, database, thresholds, and benchmarks. The difference is data completeness and the claims that can be put on a label.

Key Date

27 September 2026 — EU Directive 2024/825 enforcement begins. After this date, environmental claims on food packaging must be backed by a compliant certification scheme. Without a label licence under EmpCo (or an equivalent scheme), products carrying an unlicensed provider's label face regulatory challenge.

2. What Changes for a Provider

Validation and the annual verification cycle introduce operational obligations on top of running an assessment system. This section maps them to concrete roles and workflows.

Typical Roles and Responsibilities

Role	Responsibilities	Est. FTE
VVB Liaison	Coordinate validation and verification engagements, submit change proposals, handle VVB correspondence, maintain engagement-ready documentation	0.3
Change Manager	Classify every release of the calculation engine and database, run regression suite, prepare major-change proposals	0.3
QA / Sample Coordinator	Prepare sample packages for VVB verification, track discrepancy resolution, maintain traceability records	0.3
Compliance Officer	Complaint intake, non-conformity tracking, appeal coordination, annual reporting	0.2

Typical overhead: ~1.1 FTE

These roles overlap with existing engineering and quality work at most providers. The incremental effort is roughly one additional full-time-equivalent spread across 3–4 people, not four new hires. The VVB liaison and change manager roles are the most time-intensive and benefit from being held by someone who already understands the release cycle of the calculation engine and database.

Before-Validation Checklist

What must be in place *before* the initial validation:

1. **Provider pathway annex** — completed PA-01..09 declaring LCIA method, functional unit, rating system, claim types, database, engine, gap-filling logic, and the regression suite specification (size, structure, input cases)
2. **Regression test suite** — items spanning the input cases declared in PA-07.1 (typically: caterer-style minimal-data, label/retail back-of-package, full-specification primary data)
3. **QA documentation** — written procedures showing how the 5 outcome requirements (accuracy, reproducibility, completeness, traceability, outlier detection) are met
4. **Pilot sample package** — pre-assembled set of 100+ assessments with full audit trails ready for VVB review
5. **Change log infrastructure** — version-controlled changelog linking every engine/database release to its classification, regression results, and VVB reference
6. **5-year data retention** — archive system for all assessment records, input data, and gap-filling decisions

Ongoing Annual Cycle

Activity	Frequency	Details
Verification engagement	Annual	2–3 day on-site/remote engagement per ISO 14064-3; VVB reviews system + samples + changes and issues the annual verification statement
Sample verification	Annual	VVB selects 100–400 assessments (depending on level and volume); 60/40 or 50/50 random/risk-based split
Change management review	Every release	Every engine/database change classified, regression tested, and logged
Stakeholder review	Annual	Public comment period on scheme updates per governance rules
Re-validation	Every 3 years	Full re-validation + extended sample verification (3–5 days) before licence renewal

Per-Change Obligations

Every change to the calculation engine or LCI database must be classified *before* deployment:

Tier	Criteria	VVB Involvement
Non-substantive	No impact on assessment outputs (UI, docs, refactoring)	Log entry only
Minor	Impact below materiality threshold (rating change ≤2% of test suite *and* CO2 impact ≤5%)	VVB notified; reviewed at annual verification
Major	Above materiality threshold *or* structural change to methodology	**Focused re-validation by the VVB required before deployment** (20 business day review); Certification Committee informed

Materiality Threshold

A change is **major** if it causes rating-category changes for >2% of items in the regression test suite, *or* >10% CO2eq/DFU change for >5% of items. All other output-affecting changes are minor.

Per-Case Reporting

Materiality metrics are reported per input case (as declared in the provider's pathway annex PA-07.1) in addition to the aggregate. This reveals whether a change disproportionately affects one data-completeness tier — for example, a gap-filling parameter change may be material for low-data caterer-style items while negligible for full-specification items.

Data Retention

All assessment records — input data, gap-filling decisions, calculation versions, ingredient matches — must be retained for a **minimum of 5 years**. This applies to both assurance levels and includes regression test results.

Trader Binding (v0.3.7+)

A licensed provider is responsible for binding its traders to the scheme. The framework distinguishes two binding tiers per the trader's assurance level:

	Enhanced Assurance	Standard Assurance
Typical use	Traders ordering per-product in-take — any claim surface	Any claim surface, incl. on-pack/shelf at catalogue scale (sampled)
Typical scale	Tens to low hundreds	Thousands
Binding mechanism	Per-trader licence agreement signed with the provider	Provider-mediated via the standard customer terms (AGB)
Public listing	Individual entry on portal	None by default — register + status confirmation; opt-in entry possible
VVB sampling	Direct	Routed through the provider

Both forms incorporate the **Annex G** model pass-through clauses (8 clauses covering claim rules, audit consent, trader register and status disclosure, complaint cooperation, termination authority, data handling). For Standard Assurance traders at scale (e.g. 1,000+ restaurants), the provider updates its standard customer terms to include the pass-through clauses; tacit acceptance after a notification period (typically 60 days) under applicable law (Swiss B2B / EU consumer law) constitutes the licence.

Implementation effort

- Update standard customer terms (AGB) with the Annex G pass-through clauses (10 hours of legal drafting)
- Notify existing customers and run a 60-day acceptance window
- Build the trader-register export and aggregate portal statistics from the provider's CRM (2 weeks engineering)
- Document the implementation in PA-10 of the pathway annex

The architecture follows MSC and Fairtrade precedents. The VVB does **not** contract directly with each trader; the provider's contractual chain is the binding mechanism.

The provider documents its specific implementation (AGB version, customer notification record, trader register and status-confirmation setup, suspension/termination procedure, annual verification submission to the VVB) in **PA-10 of its pathway annex**.

3. Sector Fit Analysis

How well does EmpCo serve each target market segment? Assessment based on current scheme design.

Brands & Manufacturers (On-Pack)

Good fit **Strong fit**

This is the primary design target. Enhanced Assurance provides exactly what brands need: a third-party verified environmental label for product packaging that complies with EU 2024/825.

What works: Clear assessment process (typically 6-week turnaround for questionnaire; near-instant for enterprise pipeline), 24-month validity period, approved claim language by rating tier, well-defined re-assessment triggers, VVB-verified accuracy.

Friction: Data collection via supplier questionnaire takes 1–2 weeks and requires client engagement. Packaging update requirement within 6 months of rating change adds cost.

Missing: Nothing fundamental — this sector is well-served.

Retailers — Private Label

Good fit **Good fit**

Private-label products follow the same Enhanced Assurance path as brand manufacturers. Retailers control the supply chain data, making questionnaire completion straightforward.

What works: Retailer has direct access to supplier data. Rating applies to the product regardless of who sells it. A single provider-pathway validation covers all private-label assessments.

Friction: Portfolio size — a large retailer with 2,000+ private-label SKUs faces significant data collection effort via questionnaires. Enterprise data integration addresses this: automated extraction from retailer ERP/procurement systems, continuous recalculation, 24-month validity cap.

Missing: Volume-based pricing models; batch assessment workflows for similar products.

Retailers — Shelf-Wide (All Products)

Friction **Good fit via enterprise data integration**

The enterprise data integration pathway enables retailers to assess tens of thousands of products at Enhanced Assurance level. Automated extraction from retailer ERP/procurement systems, validated automated pipeline, and continuous recalculation make shelf-wide coverage practical.

What works: Enterprise data integration extracts product data from systems retailers already maintain. For third-party branded products, back-of-package label data (ingredient declaration, nutrient table, GTIN, origin label) can be parsed and assessed via the Label/Retail input case of a validated automated pipeline, delivering Enhanced Assurance accuracy ($\pm$ 10%) without per-product expert review. Retail shelf labels provide a clear display framework with anti-cherry-picking rules.

Friction: Getting sufficient data quality from enterprise systems for third-party branded products. Data completeness depends on what suppliers have shared with the retailer. Some product categories may have low data completeness ($<$ 70%), requiring more gap-filling.

Remaining gap: For branded products where the retailer holds minimal supplier data, enterprise integration may not achieve the 50% data completeness threshold for public claims. These products would need supplier cooperation or separate data collection.

Restaurants & Catering

Friction **Good fit with one constraint**

Standard Assurance is purpose-built for food service: real-time recipe entry, automatic recalculation, continuous validity.

What works: Immediate processing (<1 second per recipe), automatic gap-filling, dashboard-based reporting, low data burden (ingredients + quantities only).

Friction: The scheme prohibits selective display — a restaurant cannot show ratings only for A/B-rated dishes while hiding C–E dishes. This is intentional (prevents cherry-picking) but creates adoption resistance.

Missing: Flexibility on selective display is a policy choice, not a gap. However, restaurants not yet comfortable with full transparency may delay adoption.

B2B Ingredient Suppliers

Friction **Emerging fit**

Ingredient suppliers increasingly need environmental data for their customers' Scope 3 reporting and product assessments.

What works: Enhanced Assurance assessment of individual ingredients provides verified, standardised environmental data. Suppliers can offer this to multiple downstream customers.

Friction: Current scheme focuses on end-product / recipe assessment. Pure ingredient assessment (no final product context) may require clarification of which outcome requirements apply.

Missing: Explicit B2B data-sharing protocols; standardised API for verified data exchange; ingredient-level assessment pathway distinct from product assessment.

Summary Matrix

Sector	Fit	Primary Level	Key Issue
Brands / manufacturers	Good fit	Enhanced	None — primary design target
Retailers (private label)	Good fit	Enhanced	Volume management at scale
Retailers (shelf-wide)	Friction	Enhanced (enterprise)	Data completeness for third-party brands
Restaurants / catering	Friction	Standard	Selective display prohibition
B2B ingredient suppliers	Friction	Enhanced	No explicit ingredient pathway

4. Simplification Opportunities

Areas where individual provider operations can be streamlined without compromising the integrity of validation and verification. Each proposal below describes implementation effort, risk to VVB acceptance, and expected operational savings — these are illustrative for providers planning their internal workflows; the framework allows them but does not mandate them.

4.1 Merge Non-Substantive and Minor Change Tiers

Current: Three tiers (non-substantive, minor, major). Non-substantive changes must be logged; minor changes must be logged *and* the VVB notified.

Proposal: Combine into two tiers internally: **routine** (no output impact or below materiality — log only, VVB reviews at the annual verification) and **major** (above the validity conditions — focused re-validation required).

Effort	Low — update internal classification criteria and documentation
Risk	Low — VVB still sees everything at the annual verification engagement; no loss of oversight
Savings	10 VVB notifications/year eliminated; simpler decision tree for engineers

4.2 Scale Sample Sizes to Assessment Volume

Current: Fixed minimums (100 Enhanced, 200 Standard) regardless of actual volume. A small provider pilot producing 200 Enhanced assessments/year would have 50% sampled.

Proposal: For volumes below the first tier threshold, scale linearly: minimum 10% of assessments *or* 30 (whichever is greater), capped at the current minimums.

Effort	Low — modify sample size tables in pathway annex
Risk	Medium — the VVB may resist lower minimums; need statistical justification
Savings	Significant for early-stage deployment; reduces initial engagement burden

4.3 Single Materiality Metric

Current: Two-part test: rating changes >2% of test suite *or* CO2 impact changes >10% for >5% of test suite. The CO2 metric catches changes that shift values significantly but don't cross rating boundaries.

Proposal: Single metric — rating changes only (>2% of test suite). Rationale: rating category is what appears on labels and drives consumer decisions. Sub-threshold CO2 shifts are operationally interesting but not consumer-relevant.

Effort	Low — simplify materiality definition in pathway annex
Risk	Medium — removes a safety net; the VVB may argue for keeping dual test
Savings	Fewer borderline classifications; faster change triage

4.4 Extended Validity for Unchanged Products

Status: Now part of the scheme. Enhanced Assurance validity is **24 months** (questionnaire-based, conditional on no re-assessment trigger). Enterprise data integration assessments have **continuous validity** with a 24-month recalculation cap.

Result	50% reduction in routine re-assessments for stable questionnaire-based products. Enterprise integration products are always current.

4.5 Automate Change Classification from Git

Current: Manual classification of every release of the engine and database by the change manager.

Proposal: Tag git commits/PRs with classification metadata. CI pipeline automatically runs regression suite and suggests classification based on results. Change manager reviews and confirms (not manually determines).

Effort	Medium — requires CI integration, classification heuristics, review UI
Risk	Low — human remains in the loop; automation assists, doesn't decide
Savings	2 hours/week of manual classification work; faster release cycles; better audit trail

Don't Touch List

These elements should **not** be simplified — they are load-bearing for VVB acceptance and regulatory credibility:

- **Regression test suite minimum size** (provider-declared in PA-07.1, but adequate to give statistical validity and gap-filling coverage) — typical lower bound is in the hundreds of items spanning multiple input cases
- **Expert review for Enhanced Assurance** — differentiates the tier; the VVB expects it
- **Complaint SLAs** (30-day response) — EU Directive expectation
- **5-year data retention** — standard expectation for accredited validation/verification engagements (ISO/IEC 17029 + ISO 14065)
- **Dual assurance level structure** — maps directly to different use cases and risk profiles

5. Onboarding Roadmap

Target: initial validation statement and label licence by **August 2026**, one month before EU enforcement (27 Sep 2026). Six-month timeline starting from contract.

Critical Path (six-month example)

Month	Milestone	Key Activities
M1	**VVB Selection**	Shortlist 2–3 VVBs accredited to ISO/IEC 17029 + ISO 14065 with ISO 14067 product scope (19 such bodies exist today: 16 DAkkS + 2 ACCREDIA (RINA, TÜV Italia; Certiquality a probable third)) and with food/sustainability experience; issue RFP; negotiate timeline and fees
M2	**Pathway Annex Drafted**	Complete PA-01..09 declaring LCIA method, functional unit, rating system, claim types, database, engine, gap-filling logic, regression suite specification
M2	**Test Suite Build**	Assemble regression test suite per PA-07.1; establish CI pipeline to run suite on every commit; validate suite coverage
M2–M3	**QA Documentation**	Document all 5 outcome requirements (accuracy, reproducibility, completeness, traceability, outlier detection); create procedure manuals; prepare evidence packages
M3	**VVB Engaged**	Contract signed; VVB conducts pre-engagement gap analysis; address findings
M4	**Pilot Sample Ready**	Prepare 100+ assessment packages with full audit trails for VVB verification; run internal mock engagement
M5–M6	**Initial Validation**	3–5 day VVB validation engagement per ISO 14064-3 (system review + sample verification + documentation review); address any non-conformities
M6	**Licence Issued**	VVB issues the validation statement with its validity conditions; the Certification Committee grants the label licence, valid for 3 years subject to annual verification

> **Buffer**
>
> This timeline has 4 weeks of buffer before the 27 Sep 2026 deadline. Key risk: if the initial validation surfaces a major NC requiring 90 days of corrective action, the timeline breaks. Mitigation: invest heavily in the pre-engagement gap analysis to catch issues early.

Post-Licence Rhythm

Cadence	Activity

Every release	Run regression suite; classify change; log result; notify VVB if minor; request focused re-validation if major
Quarterly	VVB sync call — review change log, discuss upcoming changes, resolve open items
Annually	Verification engagement (2–3 days); sample verification; change management review
Every 3 years	Full re-validation with extended sample verification (3–5 days) before licence renewal

6. Recommended Actions

Top 7 Action Items for a Provider Pursuing a Label Licence

#	Action	Owner	Deadline	Priority
1	Select and contract validation/verification body (VVB)	CEO / COO	M1	P0
2	Draft and freeze provider pathway annex (PA-01..09)	Methodology Lead	M2	P0
3	Build regression test suite per PA-07.1 and CI pipeline	Engineering Lead	M2	P0
4	Document QA procedures for all 5 outcome requirements	QA Lead	M3	P0
5	Implement change classification workflow + tooling	Engineering Lead	M3	P1
6	Set up 5-year data retention and audit archive	DevOps / IT	M3	P1
7	Prepare pilot sample package (100+ assessments)	QA Lead	M4	P1

Bottom Line

A validation statement and label licence under EmpCo are achievable on a six-month timeline for any provider with an existing assessment system and the operational discipline to maintain a regression test suite. The framework is well-designed for the primary food markets (brands, private label, food service). The main execution risk is *starting too late*, not *scheme complexity*. Every week of delay compresses the buffer before the EU deadline.

Start VVB selection early.