



CLAIMS REVIEW · COMPACT PACKAGE

Environmental claims on the website of *Muster Naturkosmetik AG*

Which claims are well supported, which should you reword, and which should you rather remove now that the new EU rules apply from 27 September 2026?

This report shows what a Claims Review looks like. The company, texts and findings are made up, and any resemblance to real companies is unintended.

SCOPE Website, 16 pages incl. shop	MARKETS Switzerland, Germany, Austria	STANDARD Swiss UWG, UCPD as amended by 2024/825
PAGES AS OF 22 September 2026	REPORT 29 September 2026	ASSESSMENT BY Björn Jung

SUMMARY

Most claims have a real basis, *two should go now*

The website makes 10 environmental claims. In my assessment, two of them fall under an express ban towards consumers in the EU since 27 September 2026: “climate-neutral natural cosmetics” on the home page and the company's own “Muster Green Promise” seal. Six claims are true at their core but worded too broadly or incompletely. For each of them, this report gives a concrete wording suggestion. I rate two claims as low risk, as long as the evidence is at hand.

Muster Naturkosmetik AG does a lot that is worth talking about: hydropower, certified organic ingredients, refill pouches. What is usually missing is not the performance but the precise wording.

2

remove

No. 1 and 4

6

reword

No. 2, 3, 5, 6, 7 and 10

2

keep

No. 8 and 9

WHAT TO DO FIRST

- 1 **Remove “climate neutral”** from the home page and the footer of the product pages (No. 1).
- 2 **Take down the “Muster Green Promise” seal** on the website and in the product images (No. 4).
- 3 **Take “net zero by 2030” offline for now**, until a published implementation plan with independent review is in place (No. 7).

All claims at a glance

	CLAIM	WHERE	RATING	PRIORITY
1	“Climate-neutral natural cosmetics”	Home page, footer of all product pages	Remove	● High
2	“Eco-friendly packaging”	Shop, all 11 product pages	Reword	● High
3	“Sustainably made in Switzerland”	About us, footer	Reword	● Medium
4	“Muster Green Promise” seal	Home page, product images in the shop	Remove	● High
5	“Not tested on animals”	Home page, “What makes us different” bar	Reword	● Medium
6	“Our refill pouches save 70 % plastic”	Hand soap product page	Reword	● Medium
7	“Net zero by 2030”	Sustainability page	Reword	● High
8	“100 % Swiss hydropower in our workshop”	Sustainability page	Keep	● Low
9	“Certified to COSMOS Organic (with logo)”	Product pages, 7 of 11 products	Keep	● Low
10	“Our pump dispensers are 100 % recyclable”	FAQ	Reword	● Medium

Remove banned in my assessment, or not provable

Reword core is right, wording too broad

Keep specific, verifiable, low risk

How to read this report

Assessment. “Remove” means that in my assessment the claim falls under an express ban towards consumers in the EU, or it cannot be backed up with the material available. “Reword” means the core is right, but the wording is too broad or incomplete. “Keep” means the claim is specific and verifiable, and I rate the risk as low as long as the evidence is ready. This is a professional assessment, not a legal clearance.

Priority. High covers claims that in my assessment clearly fall under a ban or appear on many pages. Medium covers claims that would be hard to defend if challenged. Low means: just keep the evidence ready.

Placeholders. Values in [brackets] must be replaced with your own documented figures before the text goes live.

Assessment, wording suggestion and missing evidence

1

“Climate-neutral natural cosmetics”

Remove

Where Home page, footer of all product pages

Basis UCPD, Annex I point 4c · CH: UWG Art. 3 para. 1 lit. x

● Priority high

WHY

According to the sustainability page, the climate neutrality rests on certificates from a forest protection project. Since 27 September 2026, a trader may no longer tell EU consumers that a product is climate neutral because of offsetting. This applies without exception, even with an explanation in the small print. In Switzerland, climate claims have had to rest on objective and verifiable grounds since 2025, and neutrality across the whole life cycle is not shown here.

SUGGESTION

“We know our footprint: in 2025 our operations caused [value] t CO₂e (Scopes 1 and 2). By 2028 we aim to cut this by [value] %. We also support a forest protection project in Peru.”

Mention offsetting as a contribution, not as a feature of the product. The reduction target is a claim about future performance, see No. 7.

EVIDENCE

- ☐ Carbon footprint of the operations 2025 with method (e.g. GHG Protocol)
- ☐ Project details: standard, volume and vintage of the certificates

2

“Eco-friendly packaging”

Reword

Where Shop, all 11 product pages

Basis UCPD, Annex I point 4a

● Priority high

WHY

“Eco-friendly” is a generic environmental claim. It is only allowed where recognised excellent environmental performance can be shown, for example through the EU Ecolabel. The packaging does have concrete advantages that can be named directly. Since the claim appears on every product page, it pays to fix it early.

SUGGESTION

“Glass jar with [value] % recycled content, aluminium lid. Both go into glass and metal collection respectively.”

EVIDENCE

- ☐ Confirmation from the packaging supplier on recycled content (post-consumer)
- ☐ Material details for each packaging component

3

“Sustainably made in Switzerland”

Reword

Where About us, footer

Basis UCPD, Annex I point 4a

● Priority medium

WHY

Swiss origin is not the problem, the word “sustainably” without further detail is. Like “eco-friendly”, it is a generic environmental claim. It is better to name the specific thing behind it.

SUGGESTION

“Made in Switzerland, in our own workshop, powered by Swiss hydropower.”

EVIDENCE

- ☐ Guarantees of origin for the electricity (see also No. 8)

4 “Muster Green Promise” seal

Remove

Where Home page, product images in the shop **Basis** UCPD, Annex I point 2a ● Priority high

WHY

A sustainability label is only allowed if it is based on a certification scheme with independent monitoring or established by a public authority. A self-designed seal does not meet this, even if the criteria behind it are sensible.

SUGGESTION

Remove the seal. The criteria can stay as plain text, for example under “What we look out for”, with specific details instead of catch-all terms.

If you want to show a label: the organic certification under COSMOS is already in use (No. 9).

EVIDENCE

- ☐ None, the seal has to go. Also remove the graphic from product images and social media templates.

5 “Not tested on animals”

Reword

Where Home page, “What makes us different” bar **Basis** UCPD, Annex I point 10a ● Priority medium

WHY

The claim is true, but it applies to everyone: since 2013, cosmetics that were tested on animals for cosmetic purposes, or whose ingredients were, may not be sold in the EU. Presenting a legal requirement as a distinctive feature of your own offer is an unfair practice. So the problem is placing it under “What makes us different”.

SUGGESTION

“Like all cosmetics in the EU, made without animal testing.”

Take it out of the “What makes us different” bar. If you go further and have that certified, for example through Leaping Bunny, you may present it as a difference.

EVIDENCE

- ☐ Only for an additional claim: valid certificate

6 “Our refill pouches save 70 % plastic”

Reword

Where Hand soap product page **Basis** UCPD, Art. 6(1) · CH: UWG Art. 3 para. 1 lit. b ● Priority medium

WHY

The figure is plausible, but it is unclear what it is compared with: your own pump bottle, a different size or a market average. Without a baseline, a percentage can mislead even if it is calculated correctly.

SUGGESTION

“The refill pouch (500 ml) uses [value] % less plastic than two of our 250 ml pump bottles.”

EVIDENCE

- ☐ Weights of pouch and pump bottle
- ☐ Traceable calculation of the saving

7 “Net zero by 2030”

Reword

Where Sustainability page

Basis UCPD, Art. 6(2)(d)

● Priority high

WHY

Claims about future environmental performance are only allowed if a detailed and realistic implementation plan with measurable, time-bound targets is publicly available and regularly checked by an independent expert. No such plan can be found on the website. On top of that, if “net zero” is meant to rest on offsetting, the ban from No. 1 applies as well.

SUGGESTION

“Our climate plan: by 2030 we will cut emissions from our operations by [value] % compared with 2025. Interim targets, measures and the review report are [here].”

Only use this wording once the plan and the review report are published. Until then, don't advertise the target and report on what has already been achieved.

EVIDENCE

- ☐ Implementation plan with interim targets and measures
- ☐ Public report from an independent reviewer

8 “100 % Swiss hydropower in our workshop”

Keep

Where Sustainability page

Basis UCPD, Art. 6(1)

● Priority low

WHY

The claim is specific, limited to a clearly named area and verifiable. This is what environmental claims should look like.

RECOMMENDATION

No change needed. Optionally add the start year, such as “since [year]”.

EVIDENCE

- ☐ Guarantees of origin from the energy supplier for the current year

9 “Certified to COSMOS Organic (with logo)”

Keep

Where Product pages, 7 of 11 products

Basis UCPD, Annex I point 2a (met)

● Priority low

WHY

COSMOS is a certification scheme with independent monitoring, so the logo is allowed. It only appears on the products that are actually certified, not in the header of the whole shop. That is right and should stay that way for new products.

RECOMMENDATION

No change needed.

EVIDENCE

- ☐ Valid certificate and product list from the certification body

10 “Our pump dispensers are 100 % recyclable”

Reword

Where FAQ Basis UCPD, Annex I point 4b and Art. 6(1)(b) ● Priority medium

WHY

The PET bottle recycles well, the pump with its metal spring usually does not. So the claim only holds for part of the product. There is also a Swiss detail: PET collection points only take beverage bottles. Cosmetics bottles go into a plastics collection or general waste, depending on the municipality.

SUGGESTION

“The bottle is made of PET and can be recycled through plastics collections, in Germany and Austria via the yellow bin or yellow bag. The pump goes into general waste.”

EVIDENCE

- ☐ Material details for bottle and pump from the supplier

EVIDENCE CHECKLIST

Documents to keep on file

Anyone who makes an environmental claim has to be able to back it up on request, whether the request comes from an authority, a competitor or a consumer organisation. The easiest way is to keep the evidence in one place, for example one folder per claim.

EVIDENCE	FOR NO.	SOURCE	DONE
Carbon footprint of the operations 2025 with method	1, 7	In-house or with external support	☐
Offset project details (standard, volume, vintage)	1	Project provider	☐
Recycled content of the glass jars (post-consumer)	2	Packaging supplier	☐
Guarantees of origin for the electricity	3, 8	Energy supplier	☐
Weights of refill pouch and pump bottle, calculation	6	Supplier or own measurement	☐
Climate plan with interim targets and review report	7	In-house and independent reviewer	☐
COSMOS certificate with product list	9	Certification body	☐
Material details for bottle and pump	10	Packaging supplier	☐

NEXT STEPS

This week	Remove No. 1 and 4 from the website, including images, footers and page metadata.
Within 2 weeks	Put in the rewordings for No. 2, 3, 5, 6 and 10 and file the evidence from the checklist.
Decide on No. 7	Decide whether to publish a climate plan with interim targets and have it independently reviewed. Until then, don't advertise the target.

After that

The same claims probably also appear on packaging, in newsletters and on social media. These channels are not part of the Compact package, but the Complete package covers them in one go.

How this report was made

It covers every claim about environmental, climate or circularity features on the 16 pages of the website as of 22 September 2026. For Switzerland, the Federal Act against Unfair Competition (UWG) is decisive, in particular Art. 3 para. 1 lit. b (misleading statements) and lit. x (climate claims). For customers in the EU, the standard is the Unfair Commercial Practices Directive (UCPD, 2005/29/EC) as amended by Directive (EU) 2024/825, which the member states have had to apply since 27 September 2026. The national transposition laws in Germany and Austria and cosmetics law are not part of this review. The assessment rests on the material and the legal situation on the date of the report.

Communication and evidence check, not legal advice. The report gives my professional assessment of whether your claims are specific, clear and backed by evidence, and points to the rules that apply. It is not a legal opinion and not a clearance. Before large print runs or campaigns, and for cease-and-desist letters, I recommend bringing in a lawyer. My General Terms and Conditions apply.

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We go through any questions about the report
together in the closing call.