

New Law in Germany: Why the UWG Could Apply to Employer Quality Seals

Starting September 27, 2026, stricter laws will apply to quality seals. According to the DIQP, numerous employer seals are also expected to be affected.

SHERIDAN, WY, UNITED STATES, June 26, 2026 /EINPresswire.com/ -- Quality seals that identify an employer as an attractive, responsible, or outstanding [top employer](#)—or as a family-friendly employer—have long been an integral part of career pages, corporate

brochures, and social media presence. A legislative change set to take effect in a few months is now casting this widespread form of advertising in a new light. The Third Act Amending the Unfair Competition Act (UWG) was promulgated on February 19, 2026. However, another date is crucial for business practice: As of September 27, 2026, so-called sustainability seals may only be used if they are based on a recognized certification system or have been established by the government.

A European Directive Becomes German Law

The background to the new regulation is EU Directive 2024/825, which has become known under the slogan “Empowering Consumers for the Green Transition.” It is intended to protect consumers from misleading claims about the environmental and social characteristics of products and companies. This was a response to the increasingly confusing market of quality seals, whose significance is often difficult for outsiders to assess.

The key provision is found in the UWG. Going forward, the use of a sustainability label will generally be considered impermissible unless it is based on a certification system or has been established by the government. While many competition law violations involve assessing whether a statement is actually capable of significantly influencing consumer behavior in a specific case, such a consideration is entirely omitted here.

This classification has a notable consequence: The ban applies regardless of whether the content



of the promotional statement is accurate. Even a company that actually offers exemplary working conditions can leave itself open to challenge if the quality seal it uses does not meet the legal requirements for its basis. Under the new framework, truth and transparency do not replace a proper certification system.

Why Employer Seals May Fall Within the Scope of Application

It stands to reason that the regulation primarily targets environmental advertising—the term “greenwashing” dominates public debate. However, the wording of the law goes much further, a fact that many have not yet grasped. A sustainability label, as defined by the regulation, already exists when a voluntary trust label, quality mark, or comparable distinction highlights social characteristics. An environmental connection is explicitly not required ; social and ecological characteristics are given equal weight. Nor does the label have to refer to a specific product—a company’s business activities alone are sufficient.

This is precisely where employer labels come into play. They typically certify fair compensation, good working conditions, family-friendliness, equality, or continuing education—all characteristics that the legislature and the European directive explicitly classify as social characteristics. The concept of sustainability itself also supports this interpretation. Its internationally recognized foundation, the 1987 Brundtland Report, places social needs and equitable living conditions at the center. The sustainability goal of “Decent Work” in the UN 2030 Agenda continues this line of thought. Statements about quality as an employer thus touch on the social core of what is understood by sustainability. Not every employer certification will automatically fall under the regulation in the future. The decisive factors are the interplay of conditions and the specifics of each individual case.

What Makes for a Viable Certification System

Anyone wishing to continue using an employer seal must ensure that it is based on a certification system as defined by the law. The system must be open to all companies under transparent and non-discriminatory conditions. Its requirements must be developed by the system owner in collaboration with appropriate experts and stakeholders. In the event of violations, procedures must be in place that can lead to the revocation of the seal. Above all, however, compliance with the criteria must be monitored by an independent third party whose competence and independence are based on recognized standards—with respect to both the system owner and the company displaying the seal. At its core, this involves a clear separation between those who set the standards and those who verify compliance with them.

An internal evaluation process, a purchased ranking, a platform with user reviews, or the mere granting of a license for a fee generally do not meet these requirements. Accreditation according to the international standard ISO/IEC 17065 is considered possible proof, but it is not the only acceptable method. What matters is the actual structure, not the label.

What Companies Should Do Now

Experts at the [DIQP](#) advise companies to review their own use of seals well in advance of the deadline. As a first step, companies should clarify whether a mark they are using actually conveys a social quality promise and whether it reaches consumers. If both conditions are met, the next step is to examine the basis for certification: Can independent third-party verification be demonstrated? Are the criteria publicly available? Is there a procedure for revocation? Anyone who cannot clearly answer these questions should specifically request evidence from the seal provider or seek legal advice.

Checklist: How to Evaluate Employer Seals

A concise guide for an initial in-house assessment.

Step 1 – Is the employer seal even recognized?

- Does the symbol serve as an award or seal, or is it merely descriptive text?
- Does it highlight social characteristics, such as fair compensation, good working conditions, equality, family-friendliness, or professional development?
- Is it used in a way that also reaches consumers (homepage, image advertising, packaging, social media, press)?

Step 2 – Does the employer seal have a certification system?

- Does an independent third party monitor compliance with the criteria—separate from both the employer seal provider and the company itself?
- Are standard-setting and auditing separate processes?
- Are the award criteria and conditions publicly available?
- Is there a procedure for violations that leads to the withdrawal or suspension of the seal?
- Is the system open to all companies, and are the requirements developed with the involvement of appropriate experts?
- Is there accreditation or a similar certification, such as ISO/IEC 17065, with an appropriate scope of application? (recommended)
- Is the supporting documentation—criteria, accreditation certificate, rules for revocation and appeals—documented and readily available? (recommended)

As things stand, there is no general transition period extending beyond September 27, 2026. Violations may initially result in warnings as well as claims for injunctive relief and rectification from competitors and qualified associations. The much-cited fines of up to four percent of annual revenue, however, are reserved for particularly egregious cases of widespread violations with a European dimension and are not the standard consequence of a single warning letter.

The bottom line is that the new regulation demands one thing above all else from companies:

honest self-assessment. Anyone advertising with an employer seal should know what it is based on and who monitors it. Little will change for reputable, independently audited certifications—they will even be able to highlight their strengths more clearly in the future. For labels that rely primarily on self-promotion or a purchased license, however, this fall will be a test of their mettle. There is still enough time to get their labeling practices in order, provided companies start doing so now.

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