

**DIRECTORATE FOR SCIENCE, TECHNOLOGY AND INNOVATION
COMMITTEE ON CONSUMER POLICY**

Stocktake of business guidance on green claims

Draft report

113th Session of the Committee on Consumer Policy
28 April 2026
OECD, Paris

This paper provides an overview of business guidance on green claims, drawing on survey responses from 22 OECD Members. Of these, 18 have issued or are developing guidance on green claims. The analysis examines the role, structure and content of this guidance on green claims, including how common claim types are addressed. The orientations for this report were discussed at the CCP's meeting in November 2025 [[DSTI/CP\(2025\)12](#)].

This report contributes to Output Area 1.3.5, Output Result IOR 3.2 in the CCP's 2025-2026 Programme of Work and Budget.

Action required: For discussion. Written comments are welcomed by 20 May 2026.

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JT03584640

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Executive summary

In recent years, research and international enforcement actions have shown that a substantial number of green claims, i.e. assertions made by businesses about the environmentally beneficial qualities or characteristics of their goods and services (OECD, 2011^[1]; OECD, 2025^[2]), may be unclear, poorly substantiated or potentially misleading. This can hinder consumers' ability to take informed purchase decisions, erode trust in markets and put businesses investing in compliance at a competitive disadvantage.

While some businesses may intentionally use false or misleading green claims, their prevalence may also reflect the difficulties that many businesses, and especially small and medium-sized enterprises (SMEs), may face in navigating complex and fragmented regulatory landscapes with evolving scientific methodologies and technical requirements. Such uncertainty is exacerbated by inconsistent definitions across jurisdictions of key terms (e.g. “recyclable”, “biodegradable”, and “carbon neutral”) and uneven uptake of frameworks for measuring and substantiating claims in a reliable and comparable way.

In most OECD jurisdictions, false, misleading or unsubstantiated green claims are prohibited under general regulatory frameworks addressing the use of false or misleading commercial practices, or green claim-specific legislation (OECD, 2025^[2]). However, broad cross-sectoral prohibitions often do not detail how high-level obligations translate into concrete compliance for a given green claim. Approaches to enhancing certainty and clarity for businesses vary across jurisdictions. Some, rely on general or sector-specific *ex-ante* guidance, while others provide *ex-post* clarification via enforcement or court decisions. These differences heighten compliance burdens on businesses to monitor diverging substantive rules and multiple sources of guidance.

This paper draws on survey responses and national guidance documents from 22 OECD Members. Of these, 18 have issued or are developing guidance on green claims. The analysis examines the role, structure and content of these guidance documents, including how common claim types are addressed.

Although generally non-binding in nature, guidance is considered in many enforcement decisions in jurisdictions. Of the 18 jurisdictions with guidance, 14 rely on principles-based requirements stating that green claims must be truthful, clear and accurate, supported by adequate evidence, and should not omit material information. Several jurisdictions also highlight the importance of ensuring that comparative claims rely on a fair and transparent methodology.

Specific recommendations are often also included for common types of green claims. For example, claims concerning product recyclability, biodegradability, compostability, recycled content or repairability, require precise wording and robust evidence, reflecting real-world use or disposal conditions. Broad claims, including lifecycle claims that assert a product's environmental benefits across multiple stages of its lifecycle (e.g. “sustainable” or “eco-friendly”), are generally viewed as higher risk, due to the technical complexity of assessing all possible impacts. Carbon and climate-related claims, including those involving offsetting, similarly require careful scoping, transparent substantiation and clear communication about any limitations. In addition, several guidance documents caution businesses against presenting legal-compliance requirements as voluntary environmental benefits or making forward-looking claims

without credible and measurable implementation plans. Many also highlight the need to avoid using labels or symbols that may give the false impression of independent third-party verification.

Finally, practical tools, including case studies, checklists and other self-assessment materials, are widely used to help businesses apply guidance to real-world scenarios. In several jurisdictions, these tools support not only businesses but also internal enforcement processes, contributing to more consistent and transparent regulatory practice.

Overall, the stocktake reveals that despite regulatory and institutional variations, there are many similarities among the surveyed jurisdictions in the objectives and content of business guidance on environmental claims. However, differences in the framing of principles or definitions of key terms (e.g. “recyclable”), in substantiation and evidentiary requirements, or in coverage (e.g. the specific claims addressed) may present challenges for businesses operating across borders. The OECD can help to address regulatory fragmentation by facilitating information exchange on enforcement and best practices, and by identifying areas where a shared understanding of key concepts could benefit businesses and consumers alike.

1 Introduction

1. The OECD has defined *green claims* as “assertions made by businesses about the environmentally beneficial qualities or characteristics of their goods and services” (OECD, 2011^[1]; OECD, 2025^[2]). These claims can describe, for example, how products are produced, packaged, distributed, consumed or disposed of. Findings from a 2025 OECD paper on *Protecting and Empowering Consumers in the Green Transition: Misleading Green Claims* (“2025 OECD green claims paper”) and other research show that a significant share of green claims could be false, misleading or unsubstantiated (“greenwashing”) (OECD, 2025^[2]).

2. For example, results from an international sweep of randomly selected websites promoting products and services across a range of sectors, conducted in 2020 by the International Consumer Protection and Enforcement Network (ICPEN), suggested that around 40% of green claims made online could be misleading (CMA, 2021^[3]). The European Commission (EC) (2020^[4]) found that 53% of green claims in the European Union (EU) could be considered vague, or misleading, with 40% lacking substantiation. Similarly, the Australian Competition and Consumer Commission (ACCC) observed that 57% of reviewed businesses were making “concerning” claims about their resource conservation, pollution prevention, or related initiatives - for example, by using vague or unclear terms, failing to provide adequate evidence, or using third-party symbols and certification in a confusing manner (ACCC, 2023^[5]). Such widespread use of potentially misleading green claims can not only harm consumers and erode their trust but also affect competition and penalise businesses making efforts to comply with green claims requirements.

3. While some businesses may intentionally use misleading green claims to deceive consumers, their high prevalence may also reflect the difficulties and uncertainties that businesses can face substantiating their claims (OECD, 2025^[2]). For example, robust substantiation of green claims can sometimes involve technically complex, costly, and administratively burdensome processes. This can be a particular challenge for small businesses who may lack resources and technical expertise to engage in such processes. In addition, businesses face challenges in navigating and complying with green-claims requirements that differ across jurisdictions. Such regulatory fragmentation can result, for example, from a lack of international or comparable definitions of some concepts (e.g. “recyclable” or “biodegradable”) or gaps in the adoption of frameworks aimed to help measure and substantiate products’ green credentials.

4. OECD Members use a range of regulatory and non-regulatory instruments to address greenwashing, among which business guidance has become prominent. Such guidance does not create new obligations, but rather explains how authorities interpret existing rules, the factors they consider when assessing compliance, and the steps businesses can take to reduce the risk of making misleading claims.

5. This paper provides an overview of business guidance on green claims, drawing on survey responses from 22 OECD Members.¹ Of these, 18 have issued or are developing guidance on green claims.² The analysis examines the role, structure and content of these guidance documents, including how common claim types are addressed. Section 2 examines the nature and role of business guidance, including its relationship to the underlying regulatory framework, its main functions and intended audiences. Section 3 compares the substantive content of guidance across jurisdictions, providing an overview of the principles commonly used, the references to international standards and specific requirements for frequently encountered categories of claims.

2 Nature and role of business guidance against misleading green claims

6. This section examines the nature and role of business guidance on green claims, the underpinning regulatory framework, and the practical benefits for businesses seeking to comply with consumer protection rules.

Regulatory frameworks underpinning business guidance

General and targeted prohibitions

7. A fundamental principle of consumer policy is that all claims in advertising and marketing, whether expressed or implied, must be truthful, clear and accurate, and supported by adequate evidence (OECD, 2025^[2]). Prohibitions against misleading or deceptive commercial practices operationalize this principle and form the legal basis for tackling greenwashing across OECD jurisdictions. This approach offers important advantages: it is flexible, sector-neutral and capable of adapting to novel and evolving types of claims, including new forms of green claims (OECD, 2025^[2]). However, these general standards often provide limited guidance on what they concretely require in practice for specific green claims.

8. Some jurisdictions have complemented general prohibitions with more prescriptive, green claim-specific rules. These include blacklists of forbidden claims, mandatory disclosure requirements, or prescribed substantiation standards. In 2024, for example, **Canada** amended its Competition Act to introduce provisions explicitly targeting green claims, including a requirement that claims about the environmental benefits of a product be supported by adequate and proper testing, and that claims about a business or business activity be substantiated in accordance with an internationally recognised methodology (Competition Bureau, 2025^[6]). In the **European Union**, the Unfair Commercial Practices Directive (UCPD) has been amended by the Directive on Empowering Consumers for the Green Transition (ECGT) (adopted in February 2024 and applicable from September 2026) to complement the general prohibition on misleading practices with specific prohibitions on certain types of green claims, such as generic claims of environmental benefit without substantiation, or claims based solely on carbon offsetting information. As noted in the 2025 OECD green claims paper, prescriptive rules can offer greater predictability and legal certainty for businesses. Guidance can play a similar role, especially in jurisdictions relying mostly on general prohibitions.

Compliance challenges specific to green claims

9. While general prohibitions equally apply to all types of claims, green claims often present specific compliance and enforcement challenges (OECD, 2025^[2]). Unlike claims about price or product availability, green claims are frequently based on complex and evolving scientific methodologies – including to

measure carbon footprints, assessment of lifecycle impacts, or evaluation of environmental performance of materials.

10. These challenges can affect businesses' ability to comply with existing regulatory frameworks. For example, the type of evidence or level of detail needed to substantiate a particular green claim may not always be clear. For authorities, assessing claim compliance with substantiation requirements may further require technical expertise that goes beyond the application of general consumer protection standards. Guidance can help to address these challenges by bridging the gap between high-level legal principles and the practical realities of advertising and marketing products with environmental attributes.

How jurisdictions respond: ex-ante and ex-post interpretation approaches

11. Approaches to provide businesses with guidance on interpretation of the existing laws varies across the OECD. This can be done either *ex-ante* or *ex-post*. *Ex-ante*, authorities can issue guidance or other interpretative documents that set out how general legal standards are expected to apply to green claims. This approach is intended to give businesses clarity *before* they communicate claims to consumers, reducing the risk of inadvertent non-compliance and supporting consistent enforcement practice. Of the 22 OECD Members surveyed, 18 have issued or are in the process of finalising guidance on green claims (see Table 1).³

Table 1. A snapshot of guidance on green claims

Member	Guidance (Y/N)	Year	Issuing authority	Title
Australia	Yes	2023	Australian Competition and Consumer Commission (ACCC)	Making Environmental Claims: A Guide for Business
Canada	Yes	2025	Competition Bureau	Environmental Claims and the Competition Act
Colombia	No	—	—	—
Denmark	Yes	2024	Danish Consumer Ombudsman	Environmental Marketing by Traders
France	Yes	2025	Agence de la Transition Écologique	Guide Anti-Greenwashing
Germany	No	—	—	—
Hungary	Yes	2020	Hungarian Competition Authority	Green Marketing: Guidance for Undertakings from the Hungarian Competition Authority
Ireland	Yes	2016	Advertising Standards Authority Ireland	Code of Standards for Advertising and Marketing Communications in Ireland
Israel	No	—	—	—
Italy	No	—	—	—
Japan	Yes	2013	Ministry of the Environment	Guidelines for Environmental Representations
Latvia	Yes	2017	Consumer Rights Protection Centre	Guidelines for the Use of Environmental Claims in Commercial Practice
Lithuania*	Yes	In progress	State Consumer Rights Protection Authority	Guidelines on Green Claims in Advertising
Luxembourg*	Yes	In progress	Directorate for Consumer Protection	TBC
Netherlands	Yes	2023	Authority for Consumers & Markets (ACM)	Guidelines Regarding Sustainability Claims
New Zealand	Yes	2020	New Zealand Commerce Commission (NZCC)	Environmental Claims Guidelines: A Guide for Traders
Norway	Yes	2020	Norwegian Consumer Authority (NCA)	Guidance on Sustainability Claims Used for Marketing Purposes
Portugal	Yes	2021	Directorate General for Consumers	Environmental Claims in Marketing Communications
Slovenia	Yes	2020	Ministry of the Environment and Spatial Planning	Green Labelling
Spain	Yes	2024	Ministry of Social Rights and Consumer Affairs	Guide to Sustainable Communication

Switzerland*	Yes	In progress	Federal Office for the Environment	Enforcement Aid for Assessing Climate-related Claims Within the Meaning of the Unfair Competition Act
United Kingdom	Yes	2021	Competition and Markets Authority (CMA)	Green Claims Code: Making Environmental Claims
		2024	Competition and Markets Authority	Fashion Retail: Consumer Law When Making Green Claims
		2026	Competition and Markets Authority	Making Green Claims: Getting it Right, Across the Supply Chain

Notes: Guidance documents for countries with an asterisk (*) are currently being developed.

Source: Input provided by OECD Members in response to the Secretariat's request for input (dated 7 November 2025), as well as publicly available national guidance documents.

12. Additional *ex-post* interpretation of regulatory frameworks can also be found through enforcement decisions or private litigations. For example, in **Italy**, enforcement decisions of the consumer authority represent *de facto* references for businesses. In **Germany**, civil court proceedings, often initiated by consumer organisations and trade associations, play a similar role. Both countries are among the small number of respondents that have not issued national guidance. However, businesses in Germany and Italy can also draw on *ex-ante* guidance from the European Commission (“the EU Notice”) on the interpretation and application of the Unfair Commercial Practices Directive (UCPD), including with respect to green claims (EC, 2021^[7]). In practice, many jurisdictions combine elements of both models.

Legal nature of guidance

13. None of the business guidance considered in this stocktake creates new legal obligations for businesses beyond those under existing legislation. As a result, adherence to the guidance does not in itself constitute compliance in and of itself, nor does non-adherence necessarily constitute a legal breach. However, guidance is often relevant in enforcement and compliance assessments (see the sub-section below on *Objectives of guidance*).

Scope and intended audience of guidance

General and sector-specific guidance

14. Most OECD Members have issued general guidance applicable across all sectors and types of businesses making green claims - consistent with the cross-sectoral nature of the underlying legal provisions. General guidance typically sets out the principles (see Section 3) that businesses must apply when formulating, substantiating, and communicating green claims, without prescribing requirements specific to particular industries or products.

15. Some authorities have supplemented their general guidance with dedicated guidance targeting specific sectors or issues that have given rise to particular stakeholder concerns regarding greenwashing. The textile, clothing and footwear sectors have attracted particular attention in this respect, reflecting the prevalence of green claims and the complexity of the supply chains. For example, in 2022, the **Norwegian** Consumer Authority (NCA), in collaboration with **the Netherlands** Authority for Consumers and Markets (ACM), issued joint guidance on the use of the Higg Material Sustainability Index (MSI) – a specific methodological tool for measuring environmental impact in the textile industry – to ensure that related marketing complied with the UCPD. Similarly, following investigations in 2023 into the practices of several companies, the **United Kingdom's** Competition and Markets Authority (CMA) issued targeted guidance in 2024, to help the fashion retail industry understand how CMA's Green Claims Code (CMA, 2021^[8])

applies to them (CMA, 2024^[9]). At the international level, in 2025, the International Consumer Protection and Enforcement Network (ICPEN) issued a joint open letter to retailers in the textile, clothing and footwear sectors, encouraging businesses to review their green claim practices to ensure compliance with consumer law (ICPEN, 2025^[10]). While the letter does not constitute guidance in a formal sense, it encourages businesses to ensure that their claims are compliant with consumer protection law, providing businesses with a long list of principles to be followed in line with those contained in national guidance documents (see below on The use of principles as a structuring element).

16. General guidance in some jurisdictions also address sector-specific dimensions. For example, the **Danish** guidance on environmental marketing addresses green claims related to textile, clothing, and footwear within its general guidance document. **The Netherlands** supplement their general guidance with detailed, sector-specific case studies in annex, covering claims related to the textiles, clothing and footwear, air transport, and energy supply.

17. Beyond general and sector-specific guidance, some authorities have issued guidance on specific cross-cutting compliance challenges. For example, in 2026 the **UK CMA**, issued guidance on the allocation of responsibility for green claims along complex supply chains, involving numerous parties, including retailers, brands, manufacturers, and raw material suppliers (CMA, 2026^[11]). The guidance clarifies that any business that makes, repeats or passes on a green claim to a consumer is responsible for its accuracy. Similarly, the Competition and Consumer Protection Commission's (CCPC) in **Ireland** provides guidance for businesses selling reused, refurbished or recycled goods, clarifying their responsibilities when making claims about the environmental attributes of such products (CCPC, 2026^[12]).

Intended audience

18. In most jurisdictions, guidance on green claims is primarily targeted at supporting businesses' compliance with legal obligations and ensure a level playing field. It is also often used as an internal tool for use by enforcement officials. 16 out of the 18 OECD Members who have issued or are in the process of issuing guidance indicate that it is used within the authority as an interpretative benchmark for case assessment, or as a tool for market surveillance (see under *Functions* below for more details).

19. Guidance in some jurisdictions targets a wider range of stakeholders, including consumers, civil society organisations, and other government bodies. For example, guidance from **Portugal** contains "information aimed at consumers, alerting them to the problem of environmental claims used in marketing and advertising" (Directorate General for Consumers, 2021^[13]). Guidance from **Japan** further highlights a possible use by third-party organisations involved in the certification of products (Ministry of the Environment, 2013^[14]). Guidance from **France** targets the widest possible audience, including marketing and compliance professionals and trade associations in addition to businesses.

20. **Slovenia's** guidance, on the other hand, is mainly directed at public procurement officials rather than businesses. Its aim is to support the use of green claims and labels when defining technical specifications in tender procedures, encouraging the integration of credible environmental criteria into state purchasing decisions. While informative for businesses and designers as well, its primary purpose differs from the mainstream of business-facing guidance examined in this report.

Objectives of guidance

21. Authorities that have issued guidance on green claims commonly describe it as achieving one or more of the following goals: facilitating compliance with general legal provisions; informing enforcement and case assessment; and education and capacity-building.

Facilitating compliance

22. A lack of guidance may expose businesses to two risks. First, high-level legal standards can increase the risk of inadvertent non-compliance, as businesses may struggle to assess whether a particular green claim meets evidentiary or substantiation requirements the law implies. Second, uncertainty may cause businesses to refrain from making green claims altogether - including where the envisaged claim would be entirely lawful – out of concern about enforcement action or reputational risks. This phenomenon is sometimes referred to as “greenhushing” (OECD, 2025^[2]), a form of market failure where legitimate and relevant green information is withheld from consumers.

23. Guidance can mitigate both risks by translating general legal principles into concrete compliance parameters. Where guidance sets out clear criteria or thresholds, it gives businesses greater confidence to communicate legitimate green claims. It also reduces the likelihood that well-intended efforts will inadvertently fall foul of prohibitions. In Denmark, guidance not only provides clear criteria or thresholds, but is also complemented by a preliminary notice system responding to specific business requests for clarification on a continuous base (see Box 1).

24. Of the 18 OECD Members that have submitted information and issued guidance (or are in the process of finalising it), 17 stated that reducing ambiguity and helping businesses understand their obligations is among the principle aims of the guidance.

Box 1 Preliminary notice for marketing initiatives in Denmark

The Danish Consumer Ombudsman’s guidance sets out several thresholds that clarify to businesses the requirements for particular claims. For example, it indicates that textiles or cosmetics can only be advertised as “organic” if at least 95% of the materials used come from certified organic vegetable or animal production. Similarly, it highlights that a claim referring to Polyethylene Terephthalate (PET) plastic (e.g. “made of recycled PET plastic” claim), without further clarifications, would be misleading if not at least 95% of the product were made from recycled plastic.

In addition, the Danish Consumer Ombudsman offers businesses the possibility to obtain an advance assessment of whether a planned marketing initiative – including the use of green claims – will be considered lawful. This “preliminary notice system” is available where a business is planning to use complex or general green claims (such as “climate friendly” or “climate neutral”), or where a claim raises genuinely novel legal questions.

To obtain a preliminary notice, businesses must submit a written request describing the planned marketing initiative, providing supporting documentation, and a self-assessment of compliance with applicable legislation.

Once a preliminary notice is issued, the Ombudsman cannot subsequently take action against the business in relation to the covered initiative, on the presumption that it is launched within a reasonable period following the approval. However, the Ombudsman retains its right to reassess the application if new information becomes available.

The preliminary notice system represents an example of an *ex-ante* engagement between an enforcement authority and businesses, providing a high degree of legal certainty. Many of the examples for compliant and non-compliant claims provided in the guidance directly draw on preliminary notices released by the Ombudsman under this system.

Source: Danish Consumer Ombudsman (2024), *Environmental Marketing by Traders The Danish Consumer Ombudsman’s Recommendations*, <https://forbrugerombudsmanden.dk/media/zsbirvrx/environmental-marketing-by-traders-2024.pdf>.

Informing enforcement and case assessment

25. As noted above, 16⁴ out of the 18 OECD Members who have issued or are in the process of issuing guidance indicate that it is used or will be used by enforcement staff as an interpretative reference, a benchmark for case selection, or an input into case assessment and market surveillance. By establishing a documented interpretative position, guidance can contribute to transparency, predictability and consistency in enforcement practice.

26. The practical weight that guidance carries in this context varies across jurisdictions. In **the United Kingdom**, compliance with the Green Claims Code may be considered a mitigating or aggravating factor when determining the appropriate level of penalties for infringements. In **Australia**, the ACCC uses its guidance for case selection and the development of case theories. In **France**, the Direction Générale de la Concurrence, de la Consommation et de la Répression des Fraudes (DGCCRF) uses its guidance as a benchmark when assessing a claim's compliance with environmental regulations. In **Portugal**, the Directorate-General for Consumers uses its guidance as a direct reference tool in enforcement actions, noting its grounding in the national advertising code. This illustrates that, even though the guidance itself is not formally binding, it can carry significant practical importance in enforcement cases. In **Latvia**, the Consumer Rights Protection Centre uses its guidance not only as an interpretative reference when assessing individual claims, but also as a framework for broader market surveillance and monitoring greenwashing risks.

Education tool

27. Guidance frequently serves an educational function, particularly for smaller businesses and those without in-house legal or technical expertise in green claims. The practical tools that guidance commonly provides - including examples, checklists and case illustrations (see Section 3) – are intended to make high-level legal concepts more accessible to a non-specialist audience. In doing so, it can help raise the general level of understanding of what constitutes a credible green claim across the business community, fostering a shared baseline of compliance behaviour. To the extent that guidance documents are publicly available, they also make the enforcement authority's interpretative position transparent to a wider audience – including the consumers, civil society organisations and other stakeholders - identified above as addressees of the guidance.

3 Comparative analysis of green claim guidance

28. This section examines the structure and content of the guidance from the 18 OECD Members surveyed that have issued or are in the process of issuing guidance. It also examines how guidance documents can help businesses navigate the regulatory landscape, e.g. in the form of examples, case studies or checklists.

The use of principles as a structuring element

29. Many of the guidance documents explored adopt a principles-based approach to help businesses navigate regulatory requirements. These principles, though framed differently across jurisdictions, generally reflect a combination of well-established advertising principles embedded in legislation, such as truthfulness, clarity, substantiation, and transparency - adapted to the specific challenges posed by green claims. Principles offer flexibility, allowing regulators to articulate expectations in a way that can accommodate evolving market practices, methodologies and scientific knowledge.

Overview of principles-based approaches across Members

30. Of the 18 OECD Members that have issued guidance or are in the process of finalising it, 14 frequently refer to principles in their guidance.⁵ Of those 14 OECD Members, 8 Members (**Australia, Canada, Hungary, the Netherlands, New Zealand, Norway, Spain, and the United Kingdom**) have explicitly structured their guidance around specific core principles.

- **Australia** (eight principles): accuracy and truthfulness; use of evidence; not hiding or omitting important information; explaining conditions or qualifications; avoiding broad and unqualified claims; clarity; ensuring visual elements do not give the wrong impression; being direct and open.
- **Canada** (six principles): truthful; adequately and properly tested; specific comparative claims; avoidance of exaggeration; clarity and specificity; substantiation for future claims.
- **Hungary** (four principles): specific and unambiguous wording; clear and understandable language; avoidance of exaggeration while prioritising truthfulness; accuracy and verifiability.
- **The Netherlands** (five principles): correct, clear, specific and complete claims; substantiation with facts and keeping claims up to date; fair comparisons with other products or competitors; concrete and verifiable future sustainability ambitions; useful, non-confusing visual claims and labels.
- **New Zealand** (seven principles): truthfulness and accuracy; specificity; use of substantiation; plain language; avoidance of exaggeration; caution with test-based claims; consideration of the overall impression.
- **Norway** (four principles):⁶ overall impression is crucial; all claims must be documentable; accurate, clear and balanced messaging; avoidance of means that appeal to emotions, fear or conscience.

- **Spain** (nine principles): clear and specific language; relevant and useful information; no withholding of information; updated information; fair comparative claims; research-backed information; achievable plans for future claims; avoidance of compliance claims; certification-based labelling.
- **The United Kingdom** (six principles): truthfulness and accuracy; clarity and unambiguity; no omission of relevant information; fair and meaningful comparative claims; consideration of the full life cycle; substantiation.

31. A further six Members (**Denmark, France, Japan, Latvia, Lithuania and Portugal**) rely on similar principles but adopt a structurally different approach. Rather than organising their guidance explicitly around core principles, these Members embed comparable requirements within thematic sections. The underlying principles remain present in these documents but are operationalised within subject-matter categories rather than presented as standalone principles.

Common principles across guidance documents

32. While the specific language varies, the core principles across guidance documents converge around several shared expectations. These are broadly consistent with the principles applicable to advertising claims more generally and are adapted in the guidance documents to address the specific challenges that green claims present. 4Annex A below provides an overview of how the principles identified in each Member's guidance map onto six common requirements.

- **Truthful and accurate.** Across all guidance documents that adopt a principle-based approach, claims must be factually correct and not exaggerate environmental benefits. In the context of green claims, following this requirement means, for example, ensuring that claims are kept up to date and regularly reviewed, and that the level of scientific acceptance supporting a claim is not overstated. The **Australian** guidance further stresses that businesses are responsible for verifying claims made by their suppliers, while recognising that the scope of due diligence expected may differ depending on the size of the business.
- **Substantiated.** Most guidance documents require that businesses have a reasonable evidentiary basis for their claims before the claims are made. The **Canadian** guidance, for example, refers to the need for “adequate and proper testing” as a prerequisite for green claims. Similar requirements appear in the **Australian, New Zealand** and the **United Kingdom** guidance. The **Netherlands** guidance goes further, noting that the substantiation requirements for absolute or general claims – such as “sustainable” or “environmentally friendly” – would be so strict (e.g. requiring a full life-cycle assessment) that they should only be used in very exceptional situations. The practical effect is that businesses are steered towards more specific, verifiable claims.
- **Clear and specific.** Businesses are expected to use plain language and avoid technical jargon that might confuse an average consumer. In line with the **Netherlands** warning regarding substantiation requirements above, several guidance documents caution specifically against the use of vague or general terms – such as “green”, “eco-friendly”, or “conscious” that, without further qualifications, are unlikely to convey a clear and accurate message. The **Spanish** guidance recommends using precise language, such as “*packaging produced with 30% recycled material*” rather than broad, unqualified claim. The **Netherlands** guidance similarly requires that claims be phrased in specific terms and notes that, where there is no room for clarifying a claim, the claim should not be made at all.
- **Not misleading in overall impression.** A number of guidance documents require that claims be assessed not in isolation, but in the context of the overall impression they create – taking into account the combination of text, imagery, symbols, and colours. Even a literally true statement can be misleading if the overall impression suggests a broader environmental benefit than justified. The **Australian** guidance, for example, highlights that visual elements – such as green coloured

packaging or logos representing recycling process – can significantly influence consumer perception.

- **Disclosure of relevant information.** Several guidance documents require businesses to disclose information relevant to consumer decision-making and caution against the selective presentation of positive attributes while omitting significant adverse impacts. The **United Kingdom** guidance provides the example of a courier company claiming to use 10% more electric vehicles, noting that such a claim could be misleading if the company simultaneously fails to disclose that it is also significantly increasing its diesel fleet.
- **Fair comparisons.** A number of guidance documents include the requirement that comparative claims be fair and meaningful as a core principle. The **United Kingdom, Canada, the Netherlands** and **Spain** all list fair comparisons among their principles or rules of thumb. This requirement is discussed in more detail in the section on comparative claims below.

Additional principles identified in available guidance documents

33. Several guidance documents include additional principles beyond the six shared requirements discussed above. The most notable are discussed below:

- **Consideration of the full life cycle.** The **United Kingdom** guidance treats the requirement to consider the full life cycle of a good or service as one of its six core principles. Under this principle, if a claim relates only to one stage of the product's life (e.g. transport or packaging), such limitation must be made clear and prominent so that the overall impression is not misleading. While not all guidance documents frame the life cycle consideration as a standalone principle, the underlying concern recurs across the guidance reviewed (see also footnote 6). It is discussed further in the section on broad environmental and lifecycle claims below.
- **Claims based on legal compliance.** Some guidance documents explicitly caution businesses against presenting features that are mandatory under the law as if they were voluntary environmental commitments. The **Spanish** guidance lists this as one of its nine core principles. The **Norwegian** guidance provides a concrete example, noting that it would be misleading for an electronics firm to present itself as environmentally responsible on the basis that it accepts electrical waste in return, when this is a statutory obligation. The **Netherlands** and **Danish** guidance raise similar concerns.
- **Forward-looking and aspirational claims.** The **Netherlands, Spanish** and **Australian** guidance all include requirements relating to claims about future environmental goals or sustainability transitions among their core principles or rules of thumb. These requirements are discussed further in the section on carbon, climate-related and forward-looking claims below.
- **Labels based on certification schemes.** The **Spanish** guidance includes certification-based labelling as one of its nine principles. Several other sets of guidance address the appropriate use of sustainability labels as a significant topic (see the section on labels and certification schemes).
- **Claims that appeal to emotions, fear or conscience.** The **Norwegian** guidance includes, as one of its four structural principles, a requirement that marketing should not exploit consumers' concerns about the environment, climate change or ethics, nor their possibly limited knowledge of environmental matters.

Reference to international standards

34. Some guidance refers to international standards, most notably those from the International Organisation for Standardisation (ISO). This offers businesses a concrete, externally defined framework for evaluating and substantiating their claims, complementing the general principles discussed above.

35. The ISO 14000 series is the most frequently referenced international standard. The **Japanese** guidance, for example, relies extensively on this standard to define requirements for businesses when making green claims and referencing the specific definitions and verification methodologies established by the ISO series. The **French** guidance refers to ISO for official definitions of terms used in the guidance, such as “recyclable”, “non-ecotoxic” and “eco-designed”, which are based on ISO 14020 and subsequent standards, including ISO 14021. The **Slovenian** guidance introduces the three ISO classifications (ISO 14024, for third-party verified ecolabels; ISO 14021, for self-declared green claims; and ISO 14025, for quantified environmental product declarations), noting that the use of ISO standards by businesses is voluntary. More broadly, the **Canadian** Competition Act, as amended in 2024, requires that claims about the environmental benefits of a business or business activity be based on adequate and proper substantiation in accordance with internationally recognised methodology. The **Danish** guidance notes that calculations relating to emissions reductions are more credible when conducted by independent bodies using recognised standards.

Specific guidance on selected types of claims

36. Beyond providing overarching principles, most guidance documents also offer more specific guidance for commonly used green claims. Such guidance is provided in a variety of ways, including examples, benchmarks, and checklists, and addresses specific claim types that businesses frequently use and that consumers regularly encounter. The following sections examine how guidance addresses claims relating to: “recycled” and material content; “biodegradable”, “compostable”, “recyclable” and related end-of-life terms; “carbon neutral”, “net zero” and climate-related claims; forward looking and aspirational claims; comparative claims; broad environmental and lifecycle claims; and labels and certification schemes.

“Recycled” and material content claims

37. Guidance emphasises that material content claims must be precise, clearly qualified, and supported by verifiable evidence. Several common requirements emerge across the guidance documents reviewed. The **Australian, Danish, New Zealand, and the United Kingdom** guidance, for example, all require that claims such as “recycled” should clearly specify the percentage of recycled material and whether the claim relates to the product itself, its packaging or a particular component.

38. The **New Zealand** guidance also stresses that substantiation must be kept up to date and that businesses should avoid overstating the environmental significance of minor recycled material content. The **Danish** guidance is particularly prescriptive, highlighting that i) businesses may only use an unqualified claim such as “recycled” where at least 95% of the product consists of recycled material; and ii) claims such as “contains recycled material” should be accompanied by an explicit percentage figure. The **Canadian** guidance clarifies that a simple factual claim such as “20% recycled content” may not trigger formal product-testing requirements, but must still not be materially false or misleading, and businesses must hold adequate evidence, such as supply-chain documentation, to support such claims.

“Biodegradable”, “compostable”, “recyclable”, and related end-of-life claims

39. A consistent message across many guidance documents is that end-of-life claims - such as “biodegradable”, “compostable” or “recyclable” - can mislead consumers if they are true only under specific conditions that may not reflect real-world disposal pathways. The **Australian** guidance emphasises that claims may be valid in one locality and not another, depending on available infrastructure, including composting facilities, recycling streams, or collection points. The **New Zealand** guidance similarly requires that claims specify the relevant conditions and clarify which parts of the product they apply to. It also stresses that fine print cannot rescue an otherwise misleading headline.

40. For compostable and biodegradable claims specifically, the **New Zealand** guidance requires that i) biodegradable claims clarify where the product commonly ends up and the rate and extent of breakdown, and that ii) compostable claims specify whether composting is industrial or home-based, supported by evidence such as proof of compliance with an international composting standard. The (forthcoming) **Lithuanian** and the **Spanish** guidance recommend that businesses include specific timeframes (e.g. “compostable in industrial facilities within 6 months”) and provide links or QR codes to help consumers find the nearest specialised facility. For recyclable claims, the **Australian** guidance warns that a “100% recyclable” claim may mislead if the relevant recycling stream does not exist locally, highlighting the example of single-use coffee pods that were deemed misleading because they were not widely accepted in ordinary household collections. The **Portuguese** guidance flags a common area of bad practice where businesses claim a product is recyclable without specifying whether this applies to the product, the packaging or both. The **Latvian** and **Japanese** guidance address the labelling dimension, noting that claims using symbols such as the Mobius loop must comply with specified requirements. The **French** and **Japanese** guidance more broadly address end-of-life claims through reference to the ISO 14020 family of standards, which define interpretation and conditions for selected terms, with an emphasis on evaluation and verification requirements.

“Carbon neutral”, “net zero” and climate-related claims

41. Guidance from 13 Members discusses carbon and climate-related claims,⁷ including claims of emissions reductions, carbon neutrality, “net-zero” and similar statements. These claims are consistently treated as particularly high-risk due to their complexity and high potential to mislead consumers if not adequately qualified. Many carbon claims are forward-looking in nature, such as claims about net-zero targets or emissions reduction trajectories. The specific requirements for forward-looking claims are discussed separately below.

42. Several Members highlight the importance of substantiation for carbon claims. The **Canadian** and **Danish** guidance, for example, both stress that climate-related claims – including future ‘net-zero’ or other emission reduction targets – must be backed by concrete and measurable action plans that are already underway. The Canadian guidance specifically requires that such claims be substantiated using internationally recognised methodologies; the Danish guidance requires that reduction plans be verified by an independent body and that businesses maintain greenhouse gas accounts for current and expected future emissions. In **France**, under legislation introduced in 2021, claiming a product is ‘carbon neutral’ is prohibited unless the business produces an annual lifecycle assessment and publishes a trajectory of emission reduction with quantified ten-year targets.

43. Another common requirement concerns boundaries and disclosure. The **Australian** and **New Zealand** guidance both note that consumers may not readily understand headline claims such as “carbon neutral” or “net zero”. Their guidance therefore requires that businesses clearly specify what the claims covers – including which lifecycle stages (e.g. production, distribution, or use) and which emissions - and ensure that claims are not disproportionate relative to the business's total emissions. Where claims rely on carbon offsets, the **New Zealand** and the **Netherlands** guidance stress that offsets must be linked to actual, implemented activities and that absolute claims based solely on offsetting are likely to be misleading, since offsets do not reduce the inherent environmental impact of the product.

44. Carbon offsetting claims receive specific attention in several guidance documents. The **New Zealand** guidance specifies that offsets must be linked to tangible activities that have been implemented. For example, guaranteeing to plant trees cannot be counted as an offset until those trees have actually removed carbon from the air. The **Netherlands** is clear that absolute claims based solely on offsetting, such as “climate neutral” or “net zero”, are likely misleading because offsets do not reduce the inherent environmental impact of the product. Any reference to carbon offsetting must be framed transparently, explaining the mechanism, conditions and accessible evidence for consumers. The **Spanish** guidance

similarly cautions against any offset-based claims that create the false impression among the public that the consumption of a product has no environmental impact. **Japan's** guidance also highlights the prohibition of broad or unqualified carbon claims that lack verifiable data, requiring businesses to disclose the methodology, test parameters, boundaries and verification processes underpinning any carbon or offsetting claim.

Forward-looking and aspirational claims

45. Several guidance documents address green claims about goals that a business has not yet achieved as a distinct topic. This includes claims about targets or aspirations, whether relating to emissions, material sourcing, waste reduction or other environmental objectives.

46. One of the five principles of **the Netherlands** guidance requires that businesses distinguish clearly between claims about the current impact of their product and those reflecting sustainability ambitions. It also requires that businesses have a concrete plan of specific actions, continuous improvements and measurable targets, and that the plan has already been launched or will be launched soon. The guidance further cautions that sustainability ambitions should not be used as claims or substantiations for individual products. The **Norwegian** guidance similarly stresses that great care should be exercised when including information about future goals or visions in marketing material, noting that claims about the future are uncertain by nature, that businesses must have clear and well-defined plans for achieving these goals, and that claims must be formulated as specifically as possible. The **Australian** guidance notes that if a business makes a claim about something that will happen in the future - such as reducing emissions, achieving net-zero targets, or transitioning to renewable energy - it must have reasonable grounds for making the claim at the time it is made. The **Spanish** guidance reinforces that future objectives must be set out in a plan with time-bound commitments and the demonstrated capacity to deliver.

Comparative claims

47. Guidance from 14 Members⁸ discusses comparative claims, i.e. claims such as “greener than” or “less polluting than” that compare the environmental performance of one product or business with another. Several common requirements emerge.

48. First, the basis for the comparison must be clearly identified. Guidance from **Australia, Denmark, Spain** and the **United Kingdom** emphasise that comparative claims should specify i) what (e.g. product characteristic) is being compared, ii) what products are being compared, and iii) the relevant timeframe, as consumers tend to assume that comparisons are comprehensive, independent and current.

49. Second, comparative claims must not exaggerate differences or imply improvements that have not been achieved at all relevant lifecycle stages. The **Canadian** guidance requires that any claim implying improved environmental performance relative to competitors or previous version of the product be supported by adequate and proper testing conducted prior to the claim, using recognised methodologies and replicable conditions. **New Zealand's** guidance warns that comparative claims suggesting superiority over competitors can be misleading if they rely on marginal, irrelevant, or unrepresentative differences, or if they compare features governed by legal requirements rather than genuine voluntary improvements. Similarly, the **Spanish** guidance warns that comparisons may be misleading when the magnitude of the difference is small. **The Netherlands** guidance advises against generic comparative claims unless they can be substantiated through consistently applied, transparent and publicly accessible methodologies.

50. The **Japanese** guidance, referencing the ISO series, requires that comparative claims use the same measurement units, rely on the same functional unit, and be calculated over an appropriate and consistent assessment period. It also requires that businesses distinguish between absolute differences and relative, percentage term differences, as presenting one as the other can be misleading. Japan also requires businesses to document all underlying data, test methods, and assumptions, to ensure claims

remain accurate throughout the product's market life, and to update or withdraw claims when technological progress or competitor products shift the comparative landscape.

Broad environmental and lifecycle claims

51. Guidance from 14 Members⁹ address claims that assert environmental benefits for the product as a whole or across multiple stages of its life cycle. This includes claims that a product is “sustainable”, “eco-friendly” or “green”. These claims, which are broad in scope, carry a particular risk of overstating a product’s environmental performance and are subject to high evidentiary requirements.

52. The **United Kingdom** guidance requires that businesses consider the full life cycle when a broad claim is made and to avoid selectively highlighting minor positive aspects while overlooking significant adverse impacts in other areas. If a claim only relates to one stage (e.g. transport or packaging), that limitation must be made clear and prominent, so the overall impression is not misleading. Guidance from **Australia** stresses that lifecycle assertions should reflect real-world conditions and not merely laboratory results, and that imagery or symbols must not imply whole-of-product environmental superiority when only a narrow attribute has improved. Qualifications must sit next to the headline claim, not in fine print. The guidance from **New Zealand** warns that a truthful statement about one component (e.g. recycled packaging) can still mislead if consumers would reasonably think it applies to the entire product lifecycle. The **Spanish** guidance reinforces these requirements, cautioning that businesses should not use broader company initiatives to make claims about individual products, and provide specific, verifiable metrics or links (e.g. via a QR code) to the underlying methodology and evidence. The **Japanese** guidance, referencing the ISO series labelling standards, requires that lifecycle claims be accurate, supported by verifiable data, and avoid implying comprehensive environmental superiority when only narrow aspects are improved, due to potential trade-offs across lifecycle states.

Labels and certification schemes

53. Several guidance documents provide specific guidance on the use of sustainability labels, logos and trust marks in marketing. The core message is that such labels should only be used where they are based on genuine third-party certification schemes subject to independent and objective oversight.

54. The **Australian** guidance highlights the risk that certification-like symbols and trust marks may give the impression of independent verification where none exists, or where the scope or meaning of the certification is unclear. It further warns that businesses should not use a certification logo to imply that their entire business has been certified when only specific products have been, or that a product has been independently certified when the certification is in fact self-assessed. Similarly, guidance in **Denmark, France, Hungary, Norway** and **Spain** warns against the use of sustainability labels that are self-created, insufficiently transparent, or not subject to external oversight, emphasising that such labels may mislead consumers by implying an independent assessment of environmental performance. The **Danish** guidance specifically highlights that, under the EU’s ECGT Directive - which Member States are required to transpose by March 2026 - displaying a sustainability label that is not based on a certification scheme or not established by public authorities will be a prohibited commercial practice.

Practical examples, case studies and checklists

55. To assist businesses in applying the principles and requirements set out in their guidance, some guidance documents include illustrative examples, self-assessment checklists and working tools. An overview of the use of such tools across the guidance documents considered is provided in Table 2 and an example of a checklist included in the Portuguese guidance is provided in 4Annex B.

56. Many guidance documents include illustrative examples and case studies - both real and hypothetical - showing how the guidance applies to concrete marketing scenarios. Guidance from **Denmark**, **New Zealand** and **Spain** include examples of lawful and unlawful marketing initiatives based on precedent from previous investigations and court proceedings. The **Australian** and **the United Kingdom** guidance go further by including detailed case studies, showing how multiple principles can apply to the same claim or set of claims.

Table 2. Overview of examples, checklists and working tools in guidance

Country	Includes examples or case studies (Y/N)	Includes checklist/working tool (Y/N)
Australia	Yes	No
Canada	Yes	No
Denmark	Yes	No
France	No	No
Hungary	Yes	Yes, checklist
Ireland	No	No
Japan	Yes	Yes, checklist
Latvia	Yes	No
Lithuania*	Yes	No
Luxembourg*	TBD	No
The Netherlands	Yes	No
New Zealand	Yes	No
Norway	Yes	No
Portugal	No	Yes, checklist
Slovenia	No	No
Spain	Yes	Yes, checklist
Switzerland*	TBD	Yes, separate working tool
The United Kingdom	Yes	No

Notes: Guidance documents for countries with an asterisk (*) are currently being developed.

Source: Input provided by OECD Members in response to the Secretariat's request for input (dated 7 November 2025), as well as publicly available national guidance documents.

57. Checklists are included in the guidance provided by **Hungary**, **Japan**, **Portugal** and **Spain**. The **Spanish** guidance, for instance, provides a checklist structured around its nine principles, prompting businesses to verify whether: their language is simple and objective, generic terms have been avoided, or their green claims are supported by existing, up-to-date evidence. It also asks businesses to confirm that future plans are feasible and that any advantages claimed are not merely a reflection of existing legal requirements. Spain additionally includes learning activities (i.e. practical exercises with model answers), enabling businesses to test their understanding of the guidance. The **Portuguese** guidance frames its checklist such that a negative answer to any question is indicative of a potential problem with the claim. The **Japanese** guidance uses checklists based on ISO 14021 to guide the use of symbols and the evaluation of environmental labels.

58. A public-private association in **Switzerland** has introduced “Environmental Communication: Watch Out for Greenwashing!”, a working tool designed for small and medium-sized enterprises as part of a partnership with the Swiss Federal Office for the Environment (Go for Impact, 2025^[15]). The tool provides a practical framework for businesses to assess and communicate green claims correctly. It serves as a precursor to formal guidance expected to be published in 2026.

4 Conclusion

59. This paper provides an overview of the role, structure and content of business guidance on green claims across 18 OECD jurisdictions that have or are in the process of issuing guidance, drawing on self-reported survey responses from 22 OECD jurisdictions. Guidance can serve multiple functions: helping businesses understand their compliance obligations within and across borders; supporting market surveillance; and raising awareness among consumers, civil society and other regulators. While non-binding, it is taken into account as an interpretative reference in enforcement in some jurisdictions.

60. Ensuring that green claims are truthful, substantiated, clear and not misleading are requirements common to guidance across the surveyed jurisdictions. The guidance documents also tend to single out similar claim types – including claims relating to recyclability, biodegradability, recycled content and repairability; lifecycle claims; carbon and climate-related claims; and sustainability labels. They also identify similar risks associated with them. Several jurisdictions also highlight the importance of a fair and transparent methodology for comparative claims.

61. At the same time, guidance documents vary in their structure and level of detail. Some jurisdictions supplement general principles with specific benchmarks, detailed case studies or self-assessment checklists, while others remain at a higher level of generality. This may partly reflect differences in how jurisdictions enhance certainty for businesses, with some relying on guidance to shape business conduct, and others instead providing clarification through enforcement decisions or case law.

62. The stocktake reveals that despite regulatory and institutional variations, there are many similarities among the surveyed jurisdictions in the objectives and content of business guidance on environmental claims. However, differences in the framing of principles or definitions of key terms (e.g. “recyclable”), in substantiation and evidentiary requirements, or in coverage (e.g. the specific claims addressed) may present challenges for businesses operating across borders. The OECD can help to address regulatory fragmentation by facilitating information exchange on enforcement and best practices, and by identifying areas where a shared understanding of key concepts could benefit businesses and consumers alike.

Annex A. Mapping principles in guidance onto six common requirements

Member	Truthful and accurate	Substantiated	Clear and specific	Not misleading in overall impression	Disclosure of relevant information	Fair comparisons	Other
Australia	Accuracy and truthfulness	Use of evidence	Avoiding broad and unqualified claims; clarity	Visual elements should not give the wrong impression	Not hiding or omitting important information; explaining conditions or qualifications	—	Being direct and open about sustainability transition
Canada	Truthful; avoidance of exaggeration	Adequately and properly tested; substantiation for future claims	Clarity and specificity	—	—	Specific comparative claims	—
Hungary	Accuracy and verifiability; Avoidance of exaggeration while prioritising truthfulness	Accuracy and verifiability	Specific and unambiguous wording; clear and understandable language	—	—	—	—
The Netherlands	Correct, clear, specific and complete claims	Substantiation with facts and keeping claims up to date	Correct, clear, specific and complete claims	Correct, clear, specific and complete claims (as sub-element)	Correct, clear, specific and complete claims	Fair comparisons with other products or competitors	Concrete and verifiable future sustainability ambitions; useful, non-confusing visual claims and labels
New Zealand	Truthfulness and accuracy; avoidance of exaggeration	Use of substantiation; caution with test-based claims	Specificity; plain language	Consideration of the overall impression	—	—	—

Norway	Accurate, clear and balanced messaging	All claims must be able to be documented	Accurate, clear and balanced messaging	The overall impression is crucial	—	—	Avoidance of means that appeal to emotions, fear or conscience
Spain	Updated information	Research-backed information; Updated information	Clear and specific language	—	Relevant and useful information; no withholding of information	Fair comparative claims	Achievable plans for future claims; avoidance of legal compliance claims; certification-based labelling
The United Kingdom	Truthfulness and accuracy	Substantiation	Clarity and unambiguity	—	Not hiding or omitting important information	Fair and meaningful comparative claims	Consideration of the full life cycle

Annex B. Checklist from the Portuguese guidance

	Claim	Yes	No
1. Does the advertisement include information on the main benefit that is being claimed (describes the environmental impact throughout the product's life time)?			
2. Is the claim clear and unambiguous as to the stage of the product's life cycle to which it applies (e.g. organisational practice, product, manufacturing, packaging, shipping and/or other procedures)?			
3. Is the claim clearly, accurately and objectively worded (without using vague and ambiguous expressions and without amplifying/exaggerating the benefit)?			
4. Is the claim relevant (i.e. does it reflect the specific and concrete environmental benefit)?			
5. Is the claim based on scientific evidence and is the information/explanation that supports the claim readily and easily accessible to consumers?			
6. Is the information conveyed in simple and clear language?			
7. When using comparative advertising, are the claims/information comparable with products or services included in the same category?			
8. Is the claim regularly reviewed in order to ensure that it remains relevant (taking into account technological developments, or changing circumstances or development processes, as may be the case with competing products)?			

A negative answer (NO) is indicative of non-compliance with the law/bad practice in the claim.

Source: Directorate General for Consumers (2021), *Environmental Claims in Marketing Communications*, <https://www.sgeconomia.gov.pt/ficheiros-externos-sg/noticias-20211/dgc-guia-das-alegacoes-ambientais-na-comunicacao-comercial-pdf.aspx>.

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Endnotes

¹ The survey was carried out in November 2025 and asked Members to report whether their relevant authority or ministry had issued green claims guidance for businesses and, if so, to describe some of its key features - including its title and publications details; whether it is binding or advisory; the intended audience; how it is used in enforcement; whether it contains core principles; the types of claims it covers; and whether it draws on international standards or includes third-party verification requirements. As with any self-reported survey, responses may be subject to certain biases and may not capture all relevant instruments or institutional practices in each jurisdiction. Table 1 provides an overview of the jurisdictions that provided a response.

² Where the surveyed jurisdictions don't have publicly available guidance yet (i.e., Lithuania, Luxembourg and Switzerland), the analysis is based on information provided by these jurisdictions in their response to the survey conducted in November 2025. Lithuania further provided the Secretariat with a preliminary, non-public draft of the guidance document currently being developed.

³ As noted below, one of these (Slovenia) has issued guidance directed principally at public procurement officials rather than businesses.

⁴ Australia, Canada, Denmark, France, Hungary, Ireland, Japan, Latvia, Lithuania, the Netherlands, New Zealand, Norway, Portugal, Spain, Switzerland and the United Kingdom.

⁵ Australia, Canada, Denmark, France, Hungary, Latvia, Lithuania, the Netherlands, New Zealand, Norway, Portugal, Spain and the United Kingdom.

⁶ In its response to the OECD questionnaire, Norway identified the following five principles as underpinning its guidance: clarity, accuracy, truthfulness and unambiguity; substantiation with robust and verifiable evidence; relevance in context and significance for the entire life cycle; specificity of actions or advantages rather than vague aspirations; and avoidance of exaggeration, including in visual presentation. These draw on content from across the guidance document, including sections on brand building and certification schemes, and represent a broader synthesis than the four structural headings used in the General Chapter of the guidance itself.

⁷ Australia, Canada, Denmark, France, Hungary, Japan, Latvia, Lithuania, the Netherlands, New Zealand, Portugal, Spain and the United Kingdom.

⁸ Australia, Canada, Denmark, France, Hungary, Ireland, Japan, Latvia, Lithuania, the Netherlands, New Zealand, Portugal, Spain and the United Kingdom.

⁹ Australia, Canada, Denmark, France, Hungary, Japan, Latvia, Lithuania, the Netherlands, New Zealand, Norway, Portugal, Spain and the United Kingdom.