



Energy and Sustainability Topics – Greenwashing and green claims checklists

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Energy and Sustainability Topics – Greenwashing and green claims checklists

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1. Greenwashing and green claims

We see it every day

The Oxford English Dictionary defines 'greenwash' as 'disinformation disseminated by an organization so as to present an environmentally responsible public image'. 'Greenwashing' is actively misleading consumers or purchasers about the environmental features or benefits of a product or the environmental practices of a company. In some cases, the claims are simply misleading, in other cases they are simply untrue.

- **Tip** – When a company spends more time and money redoing their logo to include green tints than they do on actually improving their sustainability then you know they are indulging in greenwashing. Just because it is coloured green doesn't make it 'green'.

One of first major uses of greenwashing was in the hotel industry, we all remember those little signs saying 'Preserve the environment, reduce water use and detergent use – if you don't need a clean towel then put it on the towel rail'. In most cases, the objective was not to save the environment but to reduce costs for the hotel. For the cost of some small cardboard signs the hotel industry saved washing millions of towels and lots of money. Still, the guests felt 'socially responsible' so it wasn't all bad.

Green is currently the trend and it is inevitable that companies will try to present themselves as 'green' to sell more products. However, unsubstantiated and false claims must be resisted because greenwashing will eventually be discovered and result in:

- Damage to the company image and reputation.
- Reduced stakeholder confidence in the company.
- Increased complaints about misleading advertising.

Greenwashing is a contagious disease, if the competition is greenwashing there is always a temptation for any company to also use it. This temptation must be strongly resisted.

- **Tip** – There are many guides to making sustainability statements but one of the best is ISO 14021: 2016 'Environmental labels and declarations – self-declared environmental claims'. This is specifically for environmental claims but it is equally relevant for all types of claims.

Tip – Get a copy of ISO 14021 and read it carefully, it is full of great advice.

The sins of greenwashing

The list of the 'sins' of greenwashing was first developed by TerraChoice in 2007 (now part of UL – www.ul.com). The seven sins are:

- Hidden trade-off.
- No proof.
- Vagueness.
- Irrelevance.
- Lesser of two evils.
- Fibbing.
- Worshipping false labels.

Do not be guilty of any of these sins.

The rules of making claims

All self-declared claims should be:

- Accurate – unless claims are accurate (and not misleading) then they are worthless and are effectively greenwashing.

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- Verifiable – claims should be supported by verifiable documented proof. The proof should either be public information or disclosed on request. Claims should not be made using confidential information and documentation should include:
 - The standard or test method used.
 - The test results to verify the claim.
 - Other evidence if the claim cannot be made by testing the complete product.
 - Third-party verification of the results.
- Relevant to the product.
- Not misleading – claims such as ‘BPA free’ are difficult to verify and are potentially misleading (the material may be present due to contaminants). The preferred wording is ‘No added BPA’ which can be verified.
- Specific – claims should not include vague and non-specific terms such as ‘green’, ‘eco-friendly’ or ‘environmentally friendly’. Such words should only be used if they are qualified with specific verifiable claims.
- Unlikely to result in misinterpretation or misunderstanding – if a claim can be misinterpreted or misunderstood then it should include an explanation with the claim unless the claim is always valid.
- Consider the final product – if claims are being made about a product, then they should be true for the final product and look at the complete product life cycle, e.g., if you save energy in producing a product then this does not mean that the product can be marked ‘energy saving’.
- **Tip** – Some specific environmental terms, e.g., degradable, compostable, recycled content etc., are defined in ISO 14021 and the rules for using them are given in the standard.

Control the marketing

Scientists and engineers are not immune to the temptations of greenwashing but marketing departments and PR consultancies are perhaps more susceptible. They are desperate to tap into the green wave and look for the slightest positive message to amplify. Whilst this is understandable, it is still not acceptable if the rules are broken.

Instead of using greenwashing, all areas of the company should treat being green as being ‘normal’ and simply ‘the way it is around here’. This normalises sustainability in the business and it is much easier to report when everybody regards it as normal.

- **Tip** – Get a second copy of ISO 14021 and give it to the Marketing Department. Test them to make sure they have read it and adhere to it. This is not an option; it is only common sense.
- **Tip** – Bio-based and biodegradable plastics are particularly susceptible to greenwashing and European Bioplastics has produced an excellent guide ‘Claims on biodegradability and compostability on products and packaging’. This is available free from www.european-bioplastics.org/news/publications/. It is recommended reading to show how claims can be made without indulging in greenwashing.

What about the reverse?

The perils of greenwashing can sometimes lead companies into the reverse predicament of ‘greenblushing’, which is where a company is doing good work in sustainability but fails to effectively communicate their progress or the benefits of their products. This is particularly evident in the area of social sustainability where many companies do not know how to report or communicate their performance (even if they are doing quite well).

This is a fine line to tread but applying the rules against greenwashing can help to clarify what is acceptable and what is not.

- **Tip** – If you do good work then report it and don’t be ashamed of what you are doing. Start small, communicate what you actually do and get the dialogue going.

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The final words

Do not greenwash products, processes, materials or companies, now or ever. The temptation to inflate green credentials will be strong but, in the end, it is not only fruitless but the potential for reputational damage is huge.

Do not buy products from people who do it (and tell them why).

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2. Green claims general checklist – Product communications

Scope: packaging, product pages, sales decks, datasheets, labels, certifications and icons.

2.1) Claim design and boundaries

- Claim type is explicit (recycled content, recyclability, footprint, energy, water, toxicity, durability) - no vague 'eco' wording.
- Object is specific (SKU/variant, component, packaging) - not the whole product unless true.
- Boundaries are stated: what/where/when, and lifecycle stage (e.g., cradle-to-gate).
- Comparison is fair: baseline product, date, method, and like-for-like conditions are defined.

Tip: General 'green' claims carry the highest burden. Prefer measurable claims with tight scope.

2.2) Substantiation and traceability

- Evidence pack exists (method, data sources, assumptions, calculations, owner, review date).
- Recycled/biobased content has chain-of-custody or mass-balance rules documented; supplier declarations are traceable.
- Recyclability claim matches real-world conditions (collection, sorting, and local infrastructure) and specifies geography.
- Footprint/LCA claim has system boundaries, functional unit, allocation rules, and a sensitivity check.
- Any certification/logo use is licensed, current, and matches the exact scope being claimed (no 'halo' effect).

Tip: If a claim relies on a supplier statement, store the underlying test data or third-party audit where possible.

2.3) Wording and visuals

- No absolute terms ('zero impact', 'planet-safe') unless fully proven; qualifiers are clear and prominent.
- Icons/colours do not imply a broader benefit than the text supports.
- Units are unambiguous (% , by weight, CO₂e, per unit, per year).
- Trade-offs are not hidden (e.g., lower CO₂e but higher water) - disclose material ones.

Tip: Assume screenshots will be taken. Make the small print readable and near the claim.

2.4) Offsets and 'carbon neutral' product claims

- Operational reductions are separated from any carbon credits (no conflation).
- Credit details are available: standard, registry, vintage, project type, and retirement evidence.
- 'Carbon neutral' wording (if used) explains what was measured and what was compensated.

Tip: Best practice is: reduce first; use credits only for residual emissions, and say so.

2.5) Governance

- Technical owner approves the metric; Sustainability approves the framing; Legal/Compliance approves the wording.
- Claim is logged in a central register with version control.
- A refresh trigger exists (material change, supplier change, method update, annual review).

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3. Green claims general checklist - Corporate ESG communications

Scope: ESG report, website sustainability pages, employer brand, PR, awards submissions, speeches.

3.1) Inventory and metrics integrity

- Organisational boundary is defined (equity share vs control) and applied consistently.
- GHG inventory covers Scope 1, 2 and material Scope 3 categories; exclusions are justified.
- Base year is stated; recalculation policy exists for acquisitions/divestments/method changes.
- Market-based vs location-based electricity reporting is clear; renewable claims match contracts (e.g., EACs/PPAs).

Tip: If your boundary or methods change, explain the restatement and keep the old numbers available.

3.2) Targets and transition plan credibility

- Targets have interim milestones, delivery levers, owners, and resourcing assumptions (capex/opex where relevant).
- Net zero language matches your definition (scopes covered, target year, residual emissions approach).
- Progress is reported against a consistent baseline and includes setbacks, not just wins.

Tip: A pledge is a marketing line. A plan has dates, owners, budgets, and measurable milestones.

3.3) Materiality, balance and omissions

- Claims cover the material impacts and risks for the business (not just the easy wins).
- Known trade-offs and controversies are acknowledged with actions and timelines.
- Metrics are not cherry-picked; the full picture is available (method notes, coverage %, limitations).

Tip: Silence can be misleading. If a topic is material, explain how you manage it.

3.4) Offsets, removals, and 'carbon neutral company' statements

- Offsets are presented as supplementary, not a substitute for reductions; residual definition is stated.
- Removals vs avoidance/reduction credits are distinguished; permanence and reversal risk are addressed at a high level.
- You do not claim 'zero emissions' unless you literally have zero.

3.5) Governance

- Board/executive oversight is described (committee, cadence, KPIs).
- Data controls exist (source systems, audit trail, change control) and assurance scope is clear.
- All channels (website, PR, recruitment, sales) are aligned to the same approved claims set.

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4. Green claims general checklist - Investor communications

Scope: annual report, investor communications, earnings script, bond/loan materials, web pages, prospectuses.

4.1) Consistency and disclosure discipline

- ESG statements are consistent across annual report, investor communications, website, and regulatory filings.
- Quantitative claims reconcile to controlled datasets; any non-GAAP style ESG metrics are defined and bridged.
- Forward-looking statements are labelled and supported by assumptions; scenario language is not overstated.

Tip: Inconsistencies are a greenwashing trigger.

4.2) Decision-useful metrics and context

- You provide coverage: % of revenue/operations included, and material exclusions.
- Comparisons include baseline year, restatements, and boundary/method changes.
- Targets include pathway, interim milestones, and progress-to-date; not just end-date ambition.
- Climate risk/opportunity narrative is linked to financial impacts where possible (cost, capex, revenue, risk).

4.3) Use of proceeds, labels and financing claims

- If marketing a green/sustainability-linked instrument, use-of-proceeds and eligibility criteria are explicit.
- KPIs are measurable, time-bound, and externally verifiable; change clauses are explained.
- Impact reporting methodology is disclosed; double counting is avoided.

4.4) Offsets and net zero in capital markets materials

- You separate gross emissions trajectory from any credit use; reliance is quantified.
- Residual emissions definition is stated; credits are not used to imply operational decarbonisation.
- Credit quality and retirement evidence are available on request (standards, registry, vintage).

4.5) Governance

- Legal/Compliance and Finance sign-off are mandatory for investor-facing ESG claims.
- A claim register exists with evidence pack links and an expiry/review date.
- Material ESG data used externally has controls comparable to financial reporting (owner, review, traceability).

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5. Plastics processing claims

In plastics, “green claims” are credible when they’re specific, measurable, bounded, and traceable. The risky ones are the broad, feel-good labels (“eco”, “planet friendly”), especially on single-use items.

5.1) Recycled content claims (PCR/PIR)

Credible claims

- “Contains **30% post-consumer recycled (PCR) plastic by weight.**”
- “Contains **50% recycled plastic** (specify **PCR vs PIR**, by weight).”

Minimum to substantiate

- Define *what* (SKU/component), *where* (market), *when* (production period).
- Traceability/chain of custody + calculation method (and audit trail).
- If you use third-party verification, name the scheme.

Helpful schemes

- RecyClass traceability/recycled content certification (built around traceability verification).
- EuCertPlast (recycler certification focused on traceability/quality).

Avoid

- “Made from recycled plastic” without a % (people will read it as “mostly”).
- “Recycled” when you mean “recyclable”.

5.2) “Recyclable” claims (design + real-world)

Credible claims

- “Bottle is **widely recycled in the UK**; cap/label not yet widely recycled.” (or vice versa)
- “Recyclable **where facilities exist**” + specify geography and components.

UK advertising rules expect you not to exaggerate recyclability, and to avoid implying *all* parts are recyclable if only some are (<https://www.asa.org.uk/advice-online/environmental-claims-recycling.html>).

Avoid

- “100% recyclable” if only the main body is recyclable or if local collection is limited (ASA has challenged overstatement and component-level confusion).

5.3) Chemical recycling + mass balance

This is where many plastics claims fall over.

Credible claim formats

- “**Allocated via mass balance:** This product is attributed **X% recycled feedstock** using the ISCC mass balance approach.” (<https://www.iscc-system.org/wp-content/uploads/2022/11/ISCC-208-Logos-and-Claims-1.3.pdf>)
- “We replaced virgin fossil inputs with recycled feedstock **via a mass balance approach.**” ([https://www.iscc-system.org/wp-content/uploads/2023/01/ISCC PLUS Certification Guideline 012023.pdf](https://www.iscc-system.org/wp-content/uploads/2023/01/ISCC_PLUS_Certification_Guideline_012023.pdf))

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UK specific claims

- The UK government confirmed a **mass balance approach** can be used for chemically recycled plastic in the context of Plastic Packaging Tax calculations. That's tax-policy support—not a licence to imply physical content—so your communications still need to say “mass balance”.

Avoid

- “Made with chemically recycled plastic” if it's **allocation**, not physical content.
- “Endlessly recyclable” / “infinite loop” (almost never defensible).

5.4) Bio-based content claims (not the same as biodegradable)

Credible claims

- “Contains **X% biobased carbon content**, tested to ISO 16620-2.”

Avoid

- “Plant-based” without a quantified % and a test method.
- Implying “bio-based = lower carbon” unless you have a product carbon footprint/LCA to prove it.

5.5) Compostable / biodegradable claims (high scrutiny)

Credible claims

- “**Industrially compostable** to EN 13432.” (<https://www.european-bioplastics.org/faq-items/what-are-the-required-circumstances-for-a-compostable-product-to-compost/>)

ASA guidance is clear: you must hold evidence and be very clear about the *conditions* and the *extent* of biodegradation/composting.

Avoid

- “Biodegradable” on its own (people assume it breaks down in nature/sea quickly).
- Any implied “overall positive for the environment” just because it's compostable/recyclable.

6.6) “Meets regulations” claims (often misleading)

Example: “Now compliant with plastic packaging rules” can be problematic if it implies superiority versus competitors.

In the EU, packaging policy is tightening (e.g., EU Commission messaging that **all packaging must be recyclable by 2030** under the new framework). Treat “regulatory compliance” as **baseline**, not a green differentiator.

6.7) Carbon footprint / “lower CO₂” claims (credible when LCA-based)

Credible claims

- “**20% lower cradle-to-gate CO₂e vs 2023 baseline resin**, verified to ISO 14067; boundaries and assumptions available.”

Avoid

- “Low-carbon plastic” without a defined boundary, baseline, and method.