

INTEGRATED FRAMEWORK OF GREENWASHING

Types of claims used in GW	Description of GW	Indicator questions	Possible Answers	Notes
IMPACT				
I. Selective Disclosure	Claim is based on a narrow set of attributes and distracts consumers from the organisation's greater environmental impact	I.1 When making/supporting a claim about the product/organisation's environmental impact, has the organisation failed to consider the entire organisation/product/service's life cycle within its area of influence OR failed to assess the cumulative environmental impacts of its or its products' activities? For countries, does the claim cover only territorial emissions/footprints/impacts omitting a) imported ones or b) emissions from international aviation and shipping?	<p>No = No greenwash: all LCA stages are included/cumulative impacts of at least the last 5 years (for biodiversity impacts the last 2 decades) are assessed; scope 1-2 is entirely covered and scope 3 is as much as feasibly possible. For countries, emissions from international aviation and shipping OR imported emissions/footprints/impacts are covered. If not all stages/scopes are covered, there is transparency about spatial and temporal boundaries (what is and what is not covered) and even though part of the organisation or product's/service's life cycle/scope 3 emissions are excluded, provisions exist for including them.</p> <p>Likely greenwash: e.g. the claim is based on only some part of the organisation's cumulative impacts or product's/service's life cycle or large part of scope 3 is excluded and while system boundaries are transparently communicated, there are no provisions to continuously improve the coverage of all impacts.</p> <p>Yes = Obvious greenwash: there is no transparency about the fact that a significant part of LCA/scope/cumulative impact/imported emission or footprint is excluded thereby misleading consumers about the organisation's/product/service's total environmental impact. For countries, there is no transparency about imported emissions/footprints/impacts OR emissions from international aviation and shipping are excluded or not specified in targets.</p> <p>Unknown</p>	When assessing a claim related to environmental impacts, the product/service's impact over its whole life cycle (on and off-site) is relevant. For the organisation's impacts, the GRI Standards could provide an extensive list of specific measures. For products, all production steps including (where applicable) extraction through production, use, and post-use need to be included. Life cycle assessment should follow internationally accepted standards (e.g. ISO14000 series , ISO 2006). Claims lead to greenwashing where they reflect only part of the life cycle/impacts and do not make clear which part they refer to thereby creating a misleading impression about the overall impact on the environment. For assessing this indicator, it is important to understand whether a) the exact scope of action and b) the limitations/system boundaries are transparently communicated. Even if not all stages of life cycle or not all scopes/cumulative impacts can be assessed for the claim, if boundaries are clearly communicated (what is and what is not assessed) and there is a clear pathway of improving the coverage of scope, that is not a greenwash.
		I.2 While publishing the claim, has the organisation failed to disclose all information regarding social and/or environmental performance on the specific aspect the claim refers to?	<p>No = No greenwash</p> <p>Yes = Obvious greenwash</p> <p>Likely greenwash</p> <p>Unknown</p>	When publishing a positive claim about an aspect of the organisation/product/service which also has a significant negative consequence on the environment without it being disclosed by the organisation, the claim is considered a greenwash. An example is when there is a conservation/ forest restoration-type claim but forests/other biodiverse ecosystems have been destroyed to make place for tree plantations, or when reforestation/conservation efforts create large scale monocultures. This indicator also relates to claims about projects which while potentially delivering some ecological benefit, intensify existing land disputes and accelerate displacement, violence and impoverishment among local villagers and/or exacerbate poor environmental conditions for local communities.
		I.3 Does the claim a) fail to relate to aspects that are significant in terms of the product/service/organisation's environmental impact OR b) result in an undue transfer of negative impacts?	<p>No = No greenwash</p> <p>Yes = Obvious greenwash: a or b is true</p> <p>Likely greenwash: e.g. a or b is likely true, but evidence is hard to obtain.</p> <p>Unknown</p>	The claim needs to relate to aspects that are significant in terms of the organisation/ product/service's environmental impact and should not result in an undue transfer of impacts, i.e. the creation or increase of other negative environmental impacts at other stages of the organisation/product/service's life cycle should be avoided, unless the total net environmental benefit has been significantly improved.
		I.4 Does the claim a) communicate a specific type of product/service/policy as "more green", compared to competitors, even though there is no evidence that the product is "greener" than the usual production/service/policy OR b) refer to 'better' (recycled/certified/sustainable/less carbon intensive/etc.) products/services, while the organisation fails to communicate the ratio of 'better' vs 'conventional' products/services?	<p>No = No greenwash</p> <p>Yes = Obvious greenwash: a or b is true</p> <p>Likely</p> <p>Unknown</p>	Absolute claims need to be supported by a high level of substantiation. Comparative claims such as "greener" "friendlier" "more sustainable" can be justified if the advertised product/organisation/service provides environmental benefit over that of the organisations' previous products/services or competitors' products/services, and the basis of the comparison is clear. Similarly, if the advertised "better" products/services only constitute a minority of the same product/service range within the organisation creating the impression that it is the dominant type of product/service, this has to be transparently communicated, otherwise it falls under this category of greenwashing.

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		<p>I.5 Is the organisation's claim to have net-zero emissions not based on reducing its own emissions to the full extent possible, and/or it relies on offsetting rather than reductions in its own emissions? For countries, are projects outside a country's national boundaries included in a nation's accounting as offsets?</p>	<p>No = No greenwash: Rules out offsets to claim compensation for own emissions, but rather emission reduction projects are supported as contributions elsewhere. Organisations have established deep decarbonization targets and interim targets, including for residual emissions and planned removals, that allow scrutiny with respect to actually achieving their stated net zero target.</p> <p>Likely greenwash: Organisations use compensation offsets, while setting limits on the amount to be used which will be reduced over time. For countries, in-country offsets are allowed. Sub-national jurisdictions (e.g., California) using offsets outside the jurisdiction are also considered likely greenwash.</p> <p>Yes = Obvious greenwash: Net zero commitments are not based on science and there is no clarity about whether and how to use and limit offsets. At the same time offsets are used to compensate for the emissions from the continued use of fossil fuels.</p> <p>Unknown</p>	<p>Offsetting cannot "neutralize" harmful gases from fossil fuel products and cannot reduce carbon emissions entering the atmosphere. Allowing fossil fuel emissions to be "offset" by increases in biological carbon sequestration implies that fossil and biotic forms are carbon are equivalent (Carton et al., 2021) which is untrue. "Considering carbon storage on land as a means to 'offset' CO2 emissions from burning fossil fuels (and idea wide currency) is scientifically flawed" (Mackey et al. 2013). There is a long list of experts and NGOs that <u>disapprove</u> of using offsets based on avoided emissions to make net-zero claims (Bloomberg 2021). A number of organisations including the Gold Standard and NewClimate Institute have started to promote an alternative "contribution" claim (Gold Standard, 2017; Net Zero Initiative, 2019; WWF, 2019; NewClimate Institute, 2020), where companies would make voluntary contributions to finance emission reduction projects and not claim these as offsets towards a climate neutrality claim. <u>CLARA's recent report</u> (CLARA 2021) also highlights that the expansion of offset markets enables emissions to continue and thus will dangerously undermine the pathway to 1.5 C degrees. "The limited removal capacity of nature should be reserved for the most necessary of residual emissions" (<i>Ibid</i>). The <u>Science Based Targets Initiative</u> (Science Based Targets, 2021) says that "the use of offsets is not counted as reductions toward the progress of companies' science-based targets. The SBTi requires that companies set targets based on emission reductions through direct action within their own boundaries or their value chains". Similar to the contribution claim described above, "offsets are only considered to be an option for companies wanting to contribute to finance additional emission reductions beyond their science-based target/net-zero" (<i>Ibid</i>). NewClimate's <u>Climate Responsibility approach</u> (NewClimate Institute, 2020) also calls for financially supporting others' climate action but not "netting" out emissions. Offsetting abroad also provides cheap alternatives for wealthy countries not to reduce their own emissions at home - deepening climate injustice in several ways, e.g. by depriving poor nations of "cheap" carbon removal options, while giving an easier path toward realizing the same goal for wealthy nations (Carton et al., 2021).</p>
<p>II. Empty claims</p>	<p>Making claims/policies that either exaggerate achievements, or fail to live up to them</p>	<p>II.1 Has the claim a) promised some positive improvement (to environment/local communities, etc) that has not been fulfilled OR b) stated or implied environmental benefits if the benefits are negligible/short-term/disregard indigenous/marginalized populations?</p> <p>II.2 Are there strong indications that the overall marketing budget is larger than set aside for environmental improvement mentioned in the claim?</p> <p>II.3 Does the claim deflect attention to minor issues or lead to creating 'green talk' through communication that a) overstates the organisations' actual commitments, OR b) lacks any concrete action with significant and measurable impact?</p>	<p>No = No greenwash Yes = Obvious greenwash: a or b is true Likely greenwash: e.g. the promised improvement is unlikely to be achieved, or the stated benefits are likely to disregard marginalized populations Unknown</p> <p>No = No greenwash Yes = Obvious greenwash Likely greenwash: e.g. marketing budget is likely to be larger but hard evidence isn't available Unknown</p> <p>No = No greenwash Yes = Obvious greenwash: a or b is true Likely greenwash Unknown</p>	<p>While the first part of the indicator question can be judged after a deadline/commitment timeline has expired and the organisation has not delivered what was promised in the claim, the second part refers to claims of which benefits are minor, only short-term, or disregard marginalized populations, regardless whether they have been achieved or not.</p> <p>The fossil fuel industry's recent <u>ads use subtler messages</u> than outright climate denial to undermine action on global warming, e.g., portraying natural gas as a green fuel source or arguing that decarbonization would make energy unaffordable (Grist, 2021). In 2020, they spent \$10 million on Facebook ads selling "innovative" climate solutions and visions of a "lower-carbon future" (<u>InfluenceMap, 2021</u>). Although challenging to obtain, information about marketing budget may be crucial for assessing potential greenwash. One source could be the annual data available for the <u>biggest companies' ad budgets</u> (Business Chief, 2020).</p> <p>Several authors associate greenwashing to a decoupling behavior (Siano et al. 2017) which this indicator intends to capture. The organisation falls into greenwashing if it exaggerates in its communication the impact of its green practices either a) by overstating its goals, commitments that - based on available information on current trends - are unlikely to be achieved or b) without any follow-up action which has measurable and significant impact.</p>
<p>III. Irrelevant</p>	<p>Proclaiming accomplishments that are irrelevant or already required by law/competitors</p>	<p>III.1 Is the public misled to believe the claim is a result of a voluntary sustainable actions when it or much of it is compulsory by law and/or also required of competitors?</p>	<p>No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown</p>	<p>An organisation shall not claim that e.g. a product is free of certain substances if such substances are already prohibited by legislation or is standard practice of similar organisations.</p>
<p>IV. Lies</p>	<p>Claims are out-right lying</p>	<p>IV.1 Is the claim contradicted by scientific consensus?</p>	<p>No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown</p>	<p>To avoid false advertising claims, organisations need to be aware of and comply with relevant statutes and regulations that govern competition and advertising in their jurisdiction and industry. Falsity does not require illegality though and this greenwash category is commonly used by organisations that are trying to twist the truth to cover up their negative impacts on the environment. Whatever the reason for doing so, a case by case analysis is required to assess whether scientific evidence proves the falsity of a claim.</p>

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V. Just not credible	Claim touts environmental friendly attributes of a dangerous or highly controversial practice/product/service/policy	V.1 Does the claim try to make the public feel "green" about a choice that is either dangerous (to health/environment) or highly controversial with potentially long-term ecologically harmful consequences or adverse impacts on natural resources?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	This indicator is intended to capture the green marketing of products/services/policies that are presumed to be unsafe or capture claims that are not credible because based on available scientific information they may have significant harmful long-term consequences (to health or the environment). If expert studies give rise to significant disagreement or doubt over environmental impacts of certain practices/products/services, the organisation should refrain from marketing the message altogether (European Commission, 2016). Highly controversial solutions involve the choice of ecologically counter productive practices that do not maintain or enhance the ecological quality. Having a stake in/supporting fossil fuels (including gas, oils sands, and hydraulic fracking), nuclear energy, agro-fuels from primary crops, utilization of bioenergy as transitional technology, intensive industrial agriculture, sustainable aviation fuels, bottom trawling, etc. are just few examples of such controversial practices. Further references to determine when proposed solutions/practices/products are considered questionable by science: IEA's Net Zero by 2050 report (IEA, 2021) ; Roe et al (2019) ; EAT-Lancet Commission on Food, Planet, Health (EAT, 2019) .

ALIGNMENT

VI. Corporate responsibility in action	Claim does not reflect consistent organisational practice	VI.1 Are the products/procurement practices/vision or public policy positions in conflict with the claim?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	This indicator can be assessed by finding a contradicting product/policy/practice within the same organisation that makes a claim.
VII. Dubious certifications & labels	Claim has certifications that are prone to greenwash	VII.1 Is it true that the label/seal attached to the claim is not verified by an independent body?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	When an organisation chooses to use own labelling schemes, symbols or certificates for marketing purposes, these labels must only be applied to the products/services which are verified by an independent body or which meet the criteria set to qualify for use. This criteria need to demonstrate clear environmental benefits compared with competing products/organisations, should be easily publicly accessible and labels cannot be capable of being confused with other labels, including, for example, labels of publicly run labelling schemes or schemes of competitors.' (European Commission, 2016)
		VII.2 Has the organisation failed to clearly define and communicate publicly a) the scope of certification, i.e., what is and what is not assessed in terms of products and/or processes AND b) information (or its readiness to disclose information) about standards, inspection guidelines, audit reports, details of complaints including investigation summaries, and contact details of certification bodies?	No = No greenwash Likely greenwash: e.g. either (a) is true OR some of the listed documents in (b) have not been published OR not made available upon request. Yes = Obvious greenwash: Yes, either (b) or both are true Unknown	Many certification schemes do not rely on life-cycle approaches, so being clear about the exact scope of certification is crucial in order to avoid misleading consumers. "All certification schemes shall have a clearly defined scope and also indicate what is not included – to avoid "scope creep"" (EDPB, 2021). An important element of transparency and therefore increased accountability and credibility of a certification scheme is the publication of key documents (e.g. standards, inspection guidelines, audit reports) or information related to certification bodies and complaints on the organisation's website. These allow stakeholders to evaluate the performance of certificate holders and supply chain actors against the certification scheme's standards, and to assess how good a job the auditors and certification bodies have done. If information is not readily available on the website, it should be available by requesting the standard owner.
		VII.3 Has the organisation using a voluntary certification scheme (e.g. retailer/producer) failed to apply an effective due diligence policy that is regularly updated to ensure that the product claim is genuine?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	A growing literature provides somewhat mixed evidence regarding the potential for certification to reduce environmental and social impacts (Lambin et al., 2018). Many certification schemes are unable to protect ecosystems' and people's rights, and thus additional due diligence is required to provide an assurance of responsibly sourced produce. An effective due diligence screening program allows an organisation to make an informed decision about whether it is safe to proceed with the certification. Also, many certification and standards systems have a chain of custody model or traceability approach, which is critical for downstream actors to understand who they are sourcing from. However, a Chain of Custody standard might only prescribe handling processes, and not include social abuses or environmental issues that could occur across the supply chain (ISEAL Alliance, 2020).
		VII.4 Has the organisation responsible for the voluntary certification scheme (i.e. standard owner and/or NGO helping to set it up) failed to ensure that a) other stakeholders can effectively challenge the standard owner or the certification bodies through adequate and accessible complaint and objection procedure OR b) it is able to meaningfully control, challenge or sanction the certification bodies?	No = No greenwash: it has not failed to ensure either a or b Yes = Obvious greenwash: a or b is true Likely greenwash: e.g. procedures are present to challenge the standards owner and certification bodies, however they seem to be inefficient and ineffective Unknown	Most certification schemes have a dispute or grievance mechanism that enables complaints to be made against certified companies and operations, the conformity assessment bodies (CABs) and the scheme itself. However, often these mechanisms and the cases heard under them are not made public. They may not have clear processes or be easy to use, and complaints may not be addressed in a timely and comprehensive manner. They may also not provide for effective compensation to be paid to those who have been negatively affected. Certifications may also lack a third-party complaint procedure that ensures the process is fair and independent. CABs should not be able to act as both certifier and complainant. Lacking these accountability mechanisms mean the scheme can easily greenwash harmful activities.

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		VII.5 Is the organisation making/supporting the claim associated with / consistently contributing to voluntary certification schemes or committed to multi-stakeholder initiatives that a) certify business as usual OR b) certify products that do not meet its standards OR c) certify activities that have been implicated in illegality/environmental destruction/human rights abuse within its scope of certification?	No = No greenwash Yes = Obvious greenwash: a,b or c is true Likely greenwash Unknown	To address concerns of greenwashing, certification schemes need to shift away their focus from certifying as much volume as possible to concentrating on rigorous enforcement of standards and developing a strong monitoring and evaluation program. When any of the three conditions listed in the indicator question is true, the scheme can be accused of greenwashing.
VIII. Political spin	Claim boasts of green commitments, while the organisation lobbies against environmental laws	VIII.1 Has the organisation that makes the claim or that helps a corporate entity to make a claim a) lobbied for blocking/weakening pro-environmental laws and regulations OR b) sent any such submissions to politicians/governmental agencies?	No = No greenwash Yes = Obvious greenwash: a or b is true Likely Unknown	Although often hard to obtain evidence for a potential lobbying (in which case 'likely/unknown' could be the answer), there are instances when such activities become exposed. A suggested reference for this indicator is Influencemap (influencemap.org), which provides independent data and analysis on how business and finance are affecting the climate crisis. Another source is Unearthed (2021) investigations , which recently released information about how ExxonMobil continued to fight efforts to tackle climate change in the United States, despite publicly claiming to support the Paris climate agreement.
		VIII.2 Is the organisation affiliated with think tanks, trade associations or other groups that spread environmental science disinformation and/or block environmental action in contradiction to its claims?	No = No greenwash Likely greenwash: e.g. the organisation expresses its disagreement with the trade/other association but retains membership despite lack of change Yes = Obvious greenwash Unknown	Critical studies of environmental sustainability initiatives point to the need to evaluate the influence of (industry or other) groups on organizations making green claims. Social network analyses (e.g., Brulle 2019; Farrell 2015; Pattberg 2007) can be used to determine the policy position, funding contributions, or political involvement of think tanks, trade associations or other groups.
IX. Co-opted endorsement	Claims that greenwash organisation's activities are endorsed by other organisations	IX.1 Does the organisation a) help publicise/endorse another organisation's claim that is a greenwash OR b) make a contrary green claim to the harmful activities it supports from other organisations?	No = No greenwash Yes = Obvious greenwash: a or b is true Likely greenwash Unknown	This indicator assesses an organisation B and requires that a) there is an organisation A which has a claim that falls into an obvious greenwash category according to any of the indicators of this framework and there is an organisation B that supports/helps promote/endorse that claim OR b) organisation B makes a green claim while at the same time supports harmful activities/policies of organisation A. When a claim is made by an organisation with links to coal, coalexit.org could be a great resource as they have a Global Coal Exit List, showing all banks and investors who have links with coal companies. For the USA, researchers at the Political Economy Research Institute at the University of Massachusetts Amherst developed the Top 100 Polluter indexes which identify the top corporate air and water polluters and top GHG emitters (PERI, N.d).
		IX.2 While receiving payment (through partnership, donation or a membership fee for one of its programmes) from another organisation which greenwashes, does the organisation endorse that greenwash claim?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	This indicator requires that a) there is an organisation A which has a claim that falls into an obvious greenwash category according to any of the indicators of this framework AND that b) there is an organisation B - which is supported financially by organisation A - who helps to promote/endorse a product/service/policy related to the claim of organisation A.
COMMUNICATION				
X. No proof	Claim cannot be substantiated by easily accessible supporting information	X.1 Does the claim contain statements that are not based on robust, independent, verifiable and generally recognised evidence?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	Evidence that verify claims should be easily accessible by the public. The documentation for claims needs to be up to date for as long as the claims remain in use in marketing.
		XI.1 Has the claim failed to specify whether it refers to the product/packaging/service or just a portion?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	Claims can refer to a part/feature of a product/organisation (or simply to the packaging) instead of the whole product/organisation creating confusion among consumers about the claim.
		XI.2 Do the words of the claim (other than in XI.3) have unclear/ambiguous meaning that mislead people about the organisation's/ product's/service's environmental footprint/impact?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	Examples of such words are "sustainably sourced", "eco-friendly", "environmentally friendly", "more sustainable", "non-toxic", "biodegradable", "natural", etc. These are ambiguous terms, and the absence of clear definitions for many green marketing terms has made it difficult for consumers to weigh how credible corporate claims are.

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XI. Vagueness	Claim is poorly defined/broad so its real meaning is misunderstood	XI.3 When making a net-zero/carbon neutrality claim, has the organisation: a) failed to measure, track and regularly publish its emissions according to the latest IPCC guidance (e.g. scope 1 and 2 emissions - and scope 3 emissions to the furthest extent possible); OR b) based its claim on an unsubstantiated single point target without a clear strategy, implementation planning process and interim targets; OR c) failed to develop and publish a long-term strategy with a decarbonisation pathway that prioritizes reducing its own emissions?	No = No greenwash Yes = Obvious greenwash: a,b or c is true Likely greenwash Unknown	No single standard governs the way net zero is defined or measured, or even how it should be communicated. In fact there is a wide range of terms and claims used by companies in addition to "net zero", such as "carbon negative" or "climate positive"; or that they seek to achieve "net negative" emissions or "deep decarbonisation"; or that they plan to become "emissions-free" or achieve "zero emissions"; or that they are committed to a "1.5 degrees C pathway." "Most "net zero" targets involve <u>vaguely-written plans with loopholes</u> that allow emissions to continue rising - often for decades - based on the assumption that in the future new (could be risky, unproven and harmful) technologies will be able to remove CO2 from the atmosphere and compensate for or "zero out" those emissions" (Demand Climate Justice, 2020). There is much less consumer knowledge on these various terms related to carbon neutrality and net zero than about environmental issues in general, thus it is easier to confuse the average consumer who may interpret the carbon claims incorrectly (Polonsky et al., 2010).
		XI.4 Is the claim based on implementation methodologies that are a) not clear nor transparent and/or b) do not have robust metrics?	No = No greenwash Yes = Obvious greenwash: a and/or b is true Likely greenwash Unknown	Inadequate quantification attempts is another category of greenwashing. An example could be natural capital accounting, a controversial methodology which allegedly attempts to put a price on nature and ecosystems, even though the approach has large conceptual weaknesses and leads to producing figures irrelevant for demonstrating the actual state of or change within the environment in physical terms (e.g. emission cuts). Likewise, communicating on the wrong metrics, e.g., outcome instead of impact, intensity instead of absolute emissions could also fall into this category.
XII. Misleading symbols	Claim uses visuals and symbols that induce a false perception of the organisation's greenness	XII.1 Does the claim have an overall presentation designed to evoke an environmental sensitivity that a) overstates the achieved environmental benefit OR b) has no connection with the product/service/organisation?	No = No greenwash Yes = Obvious greenwash: a or b is true Likely greenwash Unknown	The wording and overall presentation (i.e. layout, choice of colours, images, pictures, sounds, symbols or labels) has to be truthful and accurate representation of the scale of the environmental benefit and has to connect with the product/service/organisation.
XIII. Jargon	Claim uses jargon/information that consumers cannot understand/verify	XIII.1 Does the claim use technical language/complex scientific jargon that makes it difficult for people to understand?	No = No greenwash Yes = Obvious greenwash Likely greenwash Unknown	Green claims containing words that only a specialist can understand is another commonly used variety of greenwashing. Often riddled with industry acronyms, jargon is difficult for outsiders to understand. For instance, the Federal Trade Commission (FTC, 2012, p. 62122) instructs to "use clear and prominent qualifying language to convey that a general environmental claim refers only to a specific and limited environmental benefit(s)". This indicator relates to products as well as policies/speeches of <u>politicians</u> (The Guardian, 2009).

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