

International Journal of Research Publication and Reviews

Journal homepage: www.ijrpr.com ISSN 2582-7421

Greenwashing in High Street Fashion: UK & EU Perspectives. Whitepaper

Charity Ilevbare-Adeniji

The Chartered Institute of Marketing, United Kingdom

Executive Summary

Greenwashing, the practice of exaggerating or fabricating a company's environmental credentials, has become pervasive in the fashion industry, especially among fast-fashion and high-street brands. Consumers increasingly demand sustainable products, yet many brands use vague buzzwords or misleading imagery to appear eco-friendly without substantive action.

This white paper examines how greenwashing manifests in fashion marketing, reviews the historical and regulatory context in the UK and EU, and presents case studies of high-profile brands (Shein, H&M, Primark, Boohoo/ASOS, etc.). We analyse impacts on consumer trust, environmental outcomes, and market fairness, and conclude with detailed recommendations for policymakers, consumers, and brands to combat greenwashing.

Defining Greenwashing in Fashion

Greenwashing refers to false or misleading environmental claims that create the appearance of sustainability.

The EU Commission describes it as giving a "false impression" of a product's or company's environmental impacts or benefits environment.ec.europa.eu.

Greenwashing can range from ambiguous buzzwords (e.g. calling garments "eco" or "conscious" without justification) to misleading labels or imagery (like using green leaves or earth icons) gov.ukdutchnews.nl.

In practice, a greenwashed fashion ad might tout "organic, recycled, sustainable cotton" without immediately clarifying that the claim refers to a future goal or only part of the product, <u>dutchnews.nl</u>, or use terms like "climate-friendly" with no data.

Environmental educators define greenwashing as "an unsubstantiated claim that deceives consumers into believing a company's products are environmentally-friendly when that is likely not the full story", <u>sustainable.ufl.edu</u>. In other words, it involves overstating sustainability to capitalise on consumer demand, <u>investopedia.comsustainable.ufl.edu</u>.

The practice was coined in 1986 when a resort promoted towel reuse while simultaneously causing other environmental harm, <u>sustainable.ufl.edu</u>. Today, it includes outdated or unproven recycling programmes, overstated recyclability, or implying circularity where none exists, <u>thesustainablefashionforum.comesgdive.com</u>.

The sheer scale of greenwashing is staggering. An EU Commission study found that 53% of green claims were "vague, misleading or unfounded" and 40% lacked any supporting evidence from the <u>environment.ec.europa.euenvironment.ec.europa.eu</u>. In practical terms, more than half of the environmental labels and claims on fashion products are unreliable. EU survey graphics illustrate this:



Figure: The EU also found that half of all "green" product labels offered weak or non-existent third-party verification environment.ec.europa.eu.

Such figures highlight that consumers cannot take marketing at face value. Indeed, research indicates that trust in environmental claims is extremely low: in the EU, most consumers know that many sustainability labels are not verified. environment.ec.europa.eubusiness.yougov.com.

In Britain, only 4% of shoppers completely trust a product's sustainability logo, while 42% only "somewhat" trust them, <u>business.yougov.com</u>. In fashion, this problem is acute: one survey showed 54% of UK fashion shoppers express scepticism about brands' sustainability claims (agreeing they "do not trust some companies' green claims")

environment.ec.europa.eubusiness.yougov.com.

In short, greenwashing undermines consumer confidence and distracts from genuine environmental efforts.

Greenwashing in Fashion Marketing

In fashion, greenwashing takes several common forms:

- Buzzword-driven "sustainable" lines: Brands often launch special collections (e.g. H&M's "Conscious" and Zara's "Join Life") to convey ecofriendliness. However, the claims can be misleading if these lines use only minimal recycled content or simply rebrand unsold inventory. Lawsuits have alleged that H&M's Conscious labels create the illusion that old clothes "simply become new garments" or never go to landfill, when in reality the company cannot recycle even a small fraction of garments sold, thesustainablefashionforum.com. Similarly, Boohoo's "Ready for the Future" range and ASOS's "Responsible Edit" have been scrutinised for unclear criteria, gov.uk. The CMA found vague marketing terms like "responsible" or "sustainable" without explanation will mislead customers. gov.ukgreenclaims.campaign.gov.uk.
- Unverified labels and eco badges: Some high-street brands stick self-made logos ("Green Choice", leaf icons) on tags to imply third-party verification. However, if independent certifiers do not back these labels, they mislead consumers. The EU found half of such green labels have weak or no verification of the environment.ec.europa.eu. For example, Primark advertised its clothing as "organic, recycled, sustainable cotton" or boasted "50% CO2 reduction" as if already achieved, dutchnews.nl, yet tiny fine-print admitted these targets were for the future (by 2027). The Dutch advertising watchdog ruled Primark's posters "misleading," since the main slogans suggested current action when none had been undertaken, dutchnews.nl.
- Cherry-picking and omission: Brands may highlight one small eco-friendly feature while ignoring broader impacts. For instance, a garment
 might be advertised as made with recycled polyester, yet the advertising omits that polyester is still oil-based plastic. ASA guidance warns
 that specific beneficial initiatives in adverts can mislead if they omit the company's "significant ongoing contribution to [overall] emissions
 or harm", whitecase.com. This could mean touting recycled fibres while hiding continued mass production of new virgin textiles.
- Misleading imagery: Using natural imagery (trees, leaves, flowers) or earth tones in ads can subliminally suggest environmental credentials.
 The CMA's undertakings prohibit using "natural" imagery to imply a product is greener than it is. Gov.uk. For example, a dress adorned with leaf motifs might falsely suggest it has recycled materials, even if it does not.
- Green product filtering: Online retailers often offer filters like "organic", "recycled", or "ethically made." If these filters are not strictly
 managed, they mislead. CMA rule states that using a "recycled" filter must only show garments meeting that criterion, gov.uk. If non-recycled
 items appear under a "recycled" filter, that is a greenwashing concern.
- Future promises: Fashion ads sometimes speak of future goals ("we aim to achieve net-zero by 2040" or "100% sustainable materials by 2030") as if they were current accomplishments. While long-term sustainability targets are valuable, presenting them in sales copy can trick consumers into believing the brand already meets those standards. Both ASA and CMA guidelines stress that future-oriented targets need context and verification. The CMA undertakings require any claimed target to be backed by a verifiable strategy and a clear timeline gov.uk.

Overall, greenwashing in fashion is characterised by vague terms and cherry-picked data. The UK's Green Claims Code advises: "Avoid using unclear terms like 'green', 'sustainable' or 'eco-friendly" unless fully substantiated, greenclaims.campaign.gov.uk. However, many brands continue to rely on such buzzwords. The EU EmpCo Directive explicitly bans generic claims (e.g. "eco-friendly", "climate friendly", "biodegradable") unless the company can prove "excellent environmental performance" for the claim morganlewis.com. This highlights the seriousness with which regulators view these common fashion marketing practices.

Regulatory Overview: UK and EU

European Union

In the EU, greenwashing has attracted high-level regulatory action. A 2023 proposal for a Green Claims Directive would require companies to substantiate voluntary environmental claims with accredited third-party verification, morganlewis.com.

In parallel, the Directive on Empowering Consumers for the Green Transition (EmpCo Directive 2024/825) was adopted in March 2024, morganlewis.com. EmpCo prohibits generic environmental claims and treats false green claims as unfair commercial practices, morganlewis.com. For

example, it bans words like "biodegradable" or "green" if unsupported <u>morganlewis.com</u>. Broad terms like "sustainable" or "responsible" are discouraged unless evidence covers social and environmental aspects <u>morganlewis.com</u>.

Member states must transpose these EU directives by 2026 morganlewis.com, and they also propose fines up to 4% of turnover for violations morganlewis.com.

The EU Commission's campaigns underscore the problem. Its Circular Economy programme reports that over half of online green claims lack adequate information <u>earth.orgenvironment.ec.europa.eu</u>.

The Commission explicitly states that unscrupulous green marketing is misleading consumers and prevents true competition on sustainability, <u>earth.org</u>. One Commission factsheet notes that trustworthy environmental claims "boost the competitiveness" of genuinely sustainable businesses, <u>environment.ec.europa.eu</u>, by creating a level playing field.

United Kingdom

Since Brexit, the UK government and regulators have separately tackled greenwashing. The UK does not yet have a mandatory green claims law, but the Competition and Markets Authority (CMA) and the Advertising Standards Authority (ASA) have taken action.

- ASA (Advertising Standards Authority): The ASA enforces the UK Advertising Codes for non-broadcast ads. In 2021, it launched a "Climate Change and Environment" project to clamp down on misleading environmental ads asa.org.uk. The ASA has ruled against dozens of greenwashing ads in multiple sectors. Its guidance now explicitly warns that ads highlighting minor environmental initiatives can mislead if they omit a business's significant harm, whitecase.com. The ASA's Code (Section 11) requires full life-cycle substantiation: e.g. an "environmentally friendly" claim must be justified from raw material to disposal asa.org.uk. The ASA can ban ads or require modifications (though it cannot fine directly). It also encourages anonymous complaints, enabling activists to trigger investigations whitecase.com.
- CMA Green Claims Code (2021): The CMA issued a "Green Claims Code" with six business core principles. whitecase.com. These include
 the fact that claims must be truthful, clear, and substantiated; they should not omit important information; and must consider the entire product's
 impact. The UK government's official Green Claims Code is designed to ensure compliance with consumer protection laws.
- CMA Fashion Sector Guidance (2024): In September 2024, the CMA published sector-specific guidance for fashion brands, whitecase.com. It draws on the undertakings secured from ASOS, Boohoo and George at Asda (Asda's fashion brand) in March 2024, gov uk. The guidance reiterates that claims must be "clear and accurate" and must not rely on unclear terms, whitecase.com. For example, it rules that describing a range as "conscious" without precise criteria misleads customers, gov.uk. It also prohibits misleading imagery and requires that product filters (e.g. "organic material only") function correctly. gov.ukwhitecase.com. These rules take effect immediately and will be enforced under Britain's new consumer-protection powers (e.g. the Digital Markets, Competition and Consumers Act 2024, which will grant the CMA stronger fining authority).
- CMA Investigations: In July 2022, the CMA opened a formal investigation into the "green" marketing of ASOS, Boohoo and George at Asda gov.uk. After 18 months, in March 2024, each agreed to sign legal undertakings to make their claims accurate and transparent on gov.uk. Under these undertakings, the companies will publish clear criteria for "eco" collections, avoid vague terms, and present the percentage of recycled content visibly ongov.uk. This was a landmark outcome: it set an industry benchmark without reaching the courts. The CMA also emphasised that other fashion retailers should review their claims. This shows that even large brands must heed the law or face similar scrutiny.

Other EU Jurisdictions

Other regulators have also taken action outside the UK and EU-wide rules. For instance, the Dutch Advertising Code Committee (Reclame Code Commissie) found Primark's labels "misleading" in October 2023, dutchnews.nl.

In 2021, the Netherlands' ACM authority forced H&M and Decathlon to revise vague sustainability marketing, imposing donations to charity as part of their settlement <u>petersandpeters.com</u>. In France, a special Advertising Jury reviewed many fashion ads in 2022-23; of 150 decisions on environmental claims, 68 found the claims fully or partially non-compliant, <u>whitecase.com</u>. In Italy, the Competition Authority (AGCM) is actively applying general unfair practice laws to greenwashing <u>whitecase.com</u>, as seen by its 2024 investigation of Shein (see below). These examples indicate a growing enforcement landscape: major economies in the EU are willing to sanction fashion companies for deceptive green marketing.

Case Studies

Shein (Fast Fashion, Online Retailer)

Shein is a Chinese fast-fashion company with a large UK/EU customer base. In late 2024, Italy's antitrust authority (AGCM) opened a greenwashing probe into Shein's website operator, <u>esgtoday.com</u>.

The investigation focuses on Shein's corporate pages (e.g. "#SHEINTHEKNOW", "evolushein" and "Social Responsibility" sections), which allegedly convey an "image of production and commercial sustainability" with generic claims about "circularity" estoday.com.

The regulator accused Shein of using "generic, vague, confusing and/or misleading environmental claims" to exploit heightened consumer sensitivity to eco-issues, esgtoday.com. In parallel, ESG media reported that Italy's AGCM noted Shein's emphasis on "decarbonisation" seemed contradictory to its fast-fashion model, esgdive.com. Shein stated that it will cooperate with the investigation. This case exemplifies how regulators apply greenwashing rules to even non-European brands selling in Europe. If found in breach, Shein could face fines up to millions of euros under Italy's Consumer Code <a href="https://www.whitecase.com/white

H&M (Global Fast Fashion)

H&M, the Swedish retail giant, has repeatedly faced greenwashing allegations. Its "Conscious" collection (launched 2011) highlights products with ≥50% "sustainable materials", earth.org. However, critics note that many Conscious garments still contain toxic chemicals or are hardly recycled, according to Earth.org. In 2022, a US class-action suit accused H&M of deceiving consumers by implying it could recycle its huge volumes of clothing, thesustainablefashionforum.com. The suit pointed out that "it would take H&M more than a decade to recycle what it sells in a matter of days." thesustainablefashionforum.com (Ultimately, the US case was dismissed on technical grounds, reuters.com, but it signalled how sharp the scrutiny has become.)

In Europe, H&M has also negotiated with regulators: during the Dutch ACM's 2021 review, H&M agreed to stop using ambiguous sustainability terms on its site and to donate €500,000 to environmental causes <u>petersandpeters.com</u>. Despite promotional claims (the company's 2021 report said it tripled recycled content usage and reduced plastic by 28%, <u>earth.org</u>), observers point out that H&M still churns out 3 billion garments annually, <u>thesustainablefashionforum.comearth.org</u>. Its sustainability messaging is often called "greenwashing" because the production scale vastly overshadows the relatively minor eco-initiatives of <u>Earth.org</u>.

Primark ("Primark Cares")

Primark markets itself as an "affordable" brand, but has also published "Primark Cares" sustainability statements. In 2023, the Dutch advertising watchdog ruled several Primark claims **misleading** <u>dutchnews.nl</u>. Posters stating "Reducing CO₂ emissions by 50%" and "Organic, recycled, sustainable and affordable cotton" implied these goals were already met, <u>dutchnews.nl</u>.

In reality, Primark's small print revealed these were targets to achieve by 2027. The Reclamecommissie noted the slogans suggested present action, while any such actions are still plans, <u>dutchnews.nl</u>. Primark's case illustrates how even aspirational goals can be deceptive if presented incorrectly. Primark disputes the ruling, insisting its aims are reported, but the episode highlights the fine line between legitimate long-term strategy and unlawful marketing.

Boohoo, ASOS, George at Asda (UK Fast Fashion)

The UK CMA's recent case is instructive. ASOS, Boohoo and George at Asda offered "sustainable" or "responsible" clothing ranges. During the investigation, CMA found that these brands sometimes used **ambiguous terms** and lacked transparency. For example, Boohoo's "Ready for the Future" range had unclear criteria. In March 2024, all three agreed to **formal undertakings** without admitting guilt, gov.uk.

Key commitments include: displaying recycled/organic fibre percentages, specifying any minimum recycled-content criteria, and not labelling a range as "environmental" unless all criteria are met, gov.uk. They also vowed not to use "natural" icons to overstate eco-friendliness, gov.uk. The CMA's actions set a precedent: if other brands are found making similar vague claims, they too could be ordered to change practices. These undertakings underscore that UK enforcement can extend to everyday retail brands.

Zara and Others

While not directly sued yet, Inditex's Zara has faced criticism for its "Join Life" collection. Critics claim that without independent auditing, any such branding is suspect. Similarly, global brands like Nike and H&M have been sued in the US for misleading claims, Reuters.com.

These examples reinforce the trend: major apparel companies, whether high street or sportswear, are under international pressure to prove their "green" assertions.

Impacts of Greenwashing

 $Green washing \ in \ fashion \ has \ \textbf{multi-faceted impacts}:$

Consumer Trust: Greenwashing generally erodes trust in sustainability claims. As noted, large fractions of consumers in the UK and EU are
sceptical of eco-labels, environment.ec.europa.eubusiness.yougov.com. When companies abuse "sustainable" branding, even well-intentioned
businesses suffer: consumers may begin to dismiss all green advertising as unreliable.

This trust deficit means legitimate, eco-friendly products lose sales and influence. For instance, consumers cannot easily identify sustainable options if every major brand uses "green" for marketing. One NGO noted that greenwashing "undermines a brand's environmental promise", breaking the consumer's trust bond, thesustainablefashionforum.com.

Environmental Outcomes: Greenwashing can slow real improvements by giving consumers a false sense of progress. If shoppers believe
they are buying sustainability, they may consume more. Studies show fashion already exerts enormous environmental pressure: EU residents
now buy ~19 kg of textiles/year, eea.Europa.eu, generating ~6.9 million tonnes of waste in 2022 (16 kg per person) eea.europa.eu. Globally,

the fashion industry contributes ~10% of greenhouse gases, more than all international flights and shipping combined, <u>unfccc.int</u> and produces 20% of industrial wastewater.

Most textiles (\approx 85%) end up in landfills or are incinerated, <u>UNFCCC.Int</u>. Greenwashed claims risk obscuring these facts. If a brand touts a minimal recycling program, it distracts from the reality that hundreds of millions of garments still go to waste annually. By blurring the truth, greenwashing delays consumers' willingness to reduce consumption or demand systemic change

Market Fairness: Greenwashing distorts competition. Companies that truly invest in sustainable practices (costly and time-consuming) are
disadvantaged when rivals gain a "green" marketing advantage through hollow claims. The EU Commission explicitly notes that true
confidence in environmental labels "will boost the competitiveness of businesses striving to increase environmental sustainability"
environment.ec.europa.eu.

In other words, cracking down on false claims levels the playing field. Conversely, allowing pervasive greenwashing rewards companies that invest in marketing over those that invest in green innovation. For example, a small UK brand that sources organic cotton and pays fair wages cannot compete with a fast-fashion giant that labels a sub-brand "organic" without verifying it.

Greenwashing **breeds cynicism** and weakens the whole sustainability movement. It can cause consumers to tune out environmental messages ("sustainability fatigue") and erode support for beneficial policies if the public perceives them as hypocritical. Moreover, it undermines accountability: brands with greenwash campaigns often face little consequence, signalling that empty words suffice.

Recommendations

To counter greenwashing and its harms, concerted action is needed by policymakers, consumers, and brands.

1. For Policymakers

- Enact Clear Regulations: The UK should follow the EU's lead by codifying rules on environmental claims. This could involve adopting or
 mirroring the EU Green Claims Directive and EmpCo Directive standards, even post-Brexit. Laws must define prohibited vague terms and
 require evidence for claims like "biodegradable" or "recyclable" in specific terms. The law should mandate scientifically verifiable data behind
 any green label whitecase.com.
- Mandatory Labelling Schemes: Introduce or strengthen official eco-labels (e.g. the EU Eco-label) and require their use for certain claims. Labels like the EU Eco-label can be trusted benchmarks for consumers' environment.ec.europa.eu. The government could also require climate-or sustainability-footprint labels on garments (e.g. product carbon footprint). This transparency lets consumers compare products truthfully. The EU is developing new criteria for labelling; UK policymakers should consider a robust UK standard (or endorse existing ones) and penalise companies that misuse labels.
- Enforcement and Penalties: Regulatory bodies need legal power to fine or sanction greenwashing. The UK's CMA and ASA should retain strong enforcement tools. For example, the draft UK Digital Markets Act and the DMCC Act envisage new fining powers these should cover environmental claims. Fines should be substantial (e.g. percentage of turnover) to deter large retailers. Importantly, regulators should have resources to monitor fashion ads and product pages actively, not just act on complaints.
- Consumer Education: Fund public awareness campaigns on greenwashing. Policymakers can partner with NGOS to produce guides (like
 the CMA's Consumer Tips) to identify genuine sustainability vs hype greenclaims.campaign.gov.uk. This helps consumers make informed
 choices. Government websites (like the Green Claims Code site) and public bodies (e.g. BEIS, DEFRA) should maintain updated advice and
 case examples.
- Global Cooperation: Because brands operate across borders, regulators should share intelligence and align standards. As seen by Shein's EU probe, UK and EU authorities can cooperate in enforcement. Aligning definitions and banned terms across the EU, UK, and key export markets (US, Japan) prevents companies from exploiting loopholes.

2. For Consumers

- Learn Key Red Flags: Consumers should watch for generic or superficial claims. Warnings include broad terms without specifics ("earth-friendly", "sustainable", "green label"), as noted by industry guidelines greenclaims.campaign.gov.ukwhitecase.com. If an eco-label lacks an independent logo or verification statement, be sceptical. Be especially wary of ads highlighting one recycled percentage without context or using nature imagery extravagantly.
- Seek Transparency: Trust brands that provide data. For example, brands that openly share their material breakdown (e.g. "40% recycled polyester") and life-cycle assessments are more credible. Check if a company has sustainability reports audited by credible third parties (such as B-Corp certification, GRI reports, or ISO14024 eco-label compliance), morganlewis.com.
- Use Tools and Labels: Look for respected eco-labels (EU Eco-label, Global Organic Textile Standard, Fairtrade, etc.) rather than storecreated ones. Government or NGO websites may list trusted certifications. Many consumer groups publish brand guides (e.g. Ethical

Consumer, Good On You) that rate fashion brands on sustainability. Use online resources like the CMA's "Check your Green Claims" tool or watchdog rulings to verify suspicious claims.

• Support System Change: Recognise that reducing overall consumption is often the best way to cut one's footprint. Ethical shopping may mean buying higher-quality clothing, renting, swapping or repairing clothes. Consumers can demand take-back and recycling programs, and reward companies with genuine circular initiatives. High consumer demand for transparency forces brands to change. Engaging on social media, signing petitions (like those targeting Shein's exploitative practices), and holding companies accountable all help shift norms.

3. For Brands and Retailers

- Substantiate Every Claim: Brands must only make claims they can fully back up. If an item is labelled "recycled", companies should publicly verify it meets standards (e.g. using recognised recycled-content certifications). If "organic", ensure certification logos (GOTS, Oeko-Tex) are shown. The EU Green Claims Directive will soon require accredited third-party verification before a green claim goes public, morganlewis.com. Proactive companies should adopt this practice now.
- Set Measurable Goals: Brands should set concrete, time-bound targets with interim metrics rather than vague promises. For instance, "20% CO₂ reduction by 2025, as measured by third-party audit." Consumers should be able to track progress. Companies should publish transparent data (e.g. carbon and water footprints per product) in sustainability reports. This transparency builds trust and avoids misleading marketing.
- Avoid Vague Language: Heed the ASA/CMA advice: drop generic terms. Instead of saying "sustainable fashion", explain how (e.g. "This blouse uses 50% organic cotton certified by X"). On product pages or tags, put any conditions or exceptions clearly alongside the claim, not hidden in small print. Show life-cycle benefits if you claim them; if you highlight a recycled fibre, note the percentage and what part of the item it covers. Gov.uk.
- Engage in Genuine Circularity: If claiming recyclability or circularity, ensure the programs exist. Do not advertise "zero waste" unless you
 have take-back schemes or proven technologies. For example, a brand cannot claim "we make clothing circular" if it only means "recyclable
 in principle by 2027" dutchnews.nl. Instead, invest in garment collection, partnerships with recyclers, or design-for-reuse. Then communicate
 those concrete efforts.
- Third-Party Accreditation: Where possible, obtain official eco-labels or certifications. The EU Commission notes that having products meet
 ISO 14024 or other official eco-label criteria is a robust way to substantiate claims, morganlewis.com. Brands should pursue recognised
 sustainability certifications in textiles (e.g. EU Eco-label, OEKO-TEX, Bluesign). Even social certifications (Fair Wear Foundation, SA8000)
 should be clearly explained in marketing.
- Internal Review: Establish internal compliance teams to pre-check marketing content against guidelines. The CMA's Fashion Guidance provides practical checkpoints (clear language, no misleading icons, accurate filters), whitecase.com. Brands should audit ads and websites to ensure all environmental claims meet these standards. Self-regulation (like the Advertising Standards Code in the UK, or the IAP code in Italy, whitecase.com) should be used proactively, not just reactively.

Conclusion

Greenwashing in high street fashion is no longer a niche concern; it is a mainstream issue drawing regulatory action and public outcry. The fast-fashion model's inherent conflict with sustainability makes it fertile ground for misleading marketing. Our review shows that UK and EU authorities are catching up, with new laws and enforcement efforts targeting false environmental claims. High-profile cases (Shein in Italy, CMA's UK undertakings, Dutch and French rulings) indicate a global trend of holding brands accountable.

For consumers, distinguishing genuine eco-fashion from greenwash requires scepticism and scrutiny. For brands, the imperative is clear: authenticity and transparency are essential. Furthermore, for policymakers, stricter rules and education campaigns are needed to protect consumers and reward truly sustainable practices. In fashion, as in other industries, **words alone are not enough;** only genuine changes in production, materials and business models will deliver the climate and social benefits shoppers increasingly demand.

Citations

- 1. European Commission Green Claims Study (2020): https://environment.ec.europa.eu/topics/circular-economy/green-claims en
- 2. UK CMA Green Claims Code for Fashion: https://greenclaims.campaign.gov.uk/fashion-guide/
- 3. UK Government Compliance with Consumer Law in Fashion Retail: https://www.gov.uk/government/publications/complying-with-consumer-law-when-making-environmental-claims-in-the-fashion-retail-sector
- 4. Shein Under Investigation by Italian Competition Authority: https://www.esgdive.com/news/shein-greenwashing-complaint-italy-fast-fashion/728718/
- 5. H&M Faces Greenwashing Lawsuit Over 'Conscious' Collection: https://www.business-humanrights.org/en/latest-news/usa-hm-faces-greenwashing-class-action-lawsuit-over-alleged-misleading-false-marketing-of-sustainable-clothing-line/

- 6. Primark's Sustainability Claims Ruled Misleading: https://www.dutchnews.nl/2023/10/primark-green-claims-misleading-dutch-advertising-watchdog/
- 7. Asda, Asos, and Boohoo Must Avoid Greenwashing After Crackdown: https://www.theguardian.com/business/2024/mar/27/asda-asos-and-boohoo-must-avoid-greenwashing-after-crackdown.
- 8. EU Lawmakers Back Fines for Companies Making False Green Claims: https://www.euractiv.com/section/energy-environment/news/eu-lawmakers-back-hefty-fines-for-companies-making-false-green-claims/
- 9. EU Targets Greenwashing Claims, Fashion a Top Offender: https://www.voguebusiness.com/sustainability/the-eu-is-targeting-greenwashing-claims-and-fashion-is-a-top-offender
- 10. The Seven Deadly Sins of Greenwashing: https://cosh.eco/en/articles/seven-deadly-sins-greenwashing
- 11. Greenwashing in Fast Fashion: The Case of Shein: https://letsdoitfoundation.org/2022/04/05/greenwashing-in-fast-fashion-the-case-of-shein/
- 12. What Is Greenwashing in Fashion and How to Spot It: https://www.mariapersonalshopper.com/post/what-is-greenwashing-in-fashion-and-how-to-spot-it