Saying the right things, in the right way.

Sustainability communication has become one of the highest-stake matters a business manages. The answer to the fear of greenwashing is not silence. It is rigour.

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A single sentence — on a label, a website or a tender response — can build trust or trigger a complaint.

Sustainability communication has become one of the highest-stakes activities a business undertakes. The market we serve has evolved enormously over the past two decades and so have the expectations and the scrutiny that surround every environmental claim. Net zero by 2050 is now a shared global ambition, regulators are increasingly active, and a single sentence on a label, a website or a tender response can either build trust or trigger a complaint.

This creates a genuine tension. Many organisations are so afraid of being accused of **greenwashing** that they say nothing at all; a behaviour now known as **greenhushing**. Both are damaging. Overstated claims attract regulatory and reputational risk; silence stalls industry progress, weakens your brand and costs you commercial opportunities, particularly in bids and tenders where green credentials are increasingly mandatory.

The resolution is straightforward in principle and demanding in practice: communicate fully but rigorously. A credible claim is specific, scope-bounded, independently verified, transparently evidenced and honest about what is achieved versus what is aspirational. Done properly, communication is not a risk to be managed but proof of a good programme, and good programmes deserve to be seen.

This paper is intended as a practical guide for business leaders, sustainability teams and marketing colleagues who need to communicate environmental progress with confidence. It explains where claims most often fail, how to construct claims that stand up to scrutiny, and how to remain visible without overstating the case.

The trap everyone fears

Greenwashing: making environmental claims that are exaggerated, unsubstantiated or misleading. The evidence explains why the fear of making this mistake is well-founded.

42%	68%	3×
of green online claims found exaggerated, false or deceptive	of consumers distrust environmental marketing claims	rise in ASA sustainability-related complaints, 2020–2024

Sources: European Commission online-claims sweep (2021); Edelman Trust Barometer (2024); ASA Annual Report (2024).

The uncomfortable truth behind these figures is that most offending claims are not made in bad faith. They originate from organisations genuinely trying to do the right thing, who simply communicate it in the wrong way. Good intentions are not a defence; the way a claim is constructed and evidenced is what determines whether it stands up.

Two cautionary tales

Two ASA rulings illustrate how claims fail — one straightforward, one far more instructive — and together they help define the principles that follow. We have gone back to the original rulings for both, because the detail is where the lesson lives.

CASE STUDY · SHELL ASA ruling, Shell UK Ltd, 2020

In January 2020, Shell ran a **radio** campaign for its Shell Go+ loyalty scheme built around the line "Drive carbon-neutral by filling up and using Shell Go+ today." Shell explained that, for Go+ members, the equivalent "well-to-wheel" emissions of the fuel were later carbon offset through nature-based projects. The Advertising Standards Authority received 17 complaints and upheld them, ruling the ad misleading.[1]

- **The loyalty scheme was never disclosed.** Nothing in the advert explained that Go+ was a scheme consumers had to actively sign up to — so listeners could interpret "Drive carbon-neutral" to mean Shell was selling a new, carbon-neutral fuel.
- **The basis of the claim was unclear.** The meaning of "carbon-neutral" was not made clear to consumers, breaching BCAP Code rules on misleading advertising (3.1) and environmental claims (9.2 and 9.3).

[1]Advertising Standards Authority, ruling on Shell UK Ltd (Shell Go+ radio advertising), 2020. See ASA advice "Environmental claims: Motoring" (Shell UK Ltd, 8 July 2020), asa.org.uk; and ASA "Environmental claims: Carbon offsetting and carbon neutral", asa.org.uk.

- **It was audio only — there was no image.** The claim was undone entirely by its words and by what they left unsaid.

*Note what the ASA did **not** object to: Shell was offsetting on a full life-cycle ("well-to-wheel") basis. The failure was one of clarity and omission, not of the underlying arithmetic — proof that a claim can be sunk by what it leaves out, even when the numbers behind it are real.*

CASE STUDY · OATLY ASA ruling, Oatly UK Ltd, 26 January 2022

Oatly is the more instructive case, because the company was genuinely acting. Its January 2021 campaign — two "Help Dad" TV adverts, paid social posts and two national press ads — led with "Oatly generates 73% less CO_2e vs. milk, calculated from grower to grocer," and pointed readers to a verification page. The footprint work had in fact been done by an independent lifecycle analysis business. The ASA received 109 complaints (including from the group A Greener World), investigated five claims and upheld four.[2]

- **A single-product figure, told as a whole-brand claim.** The 73% compared one product — Oatly Barista Edition (0.44 kg CO_2e/kg) — with whole cow's milk (1.6 kg CO_2e/kg). But consumers would read it as all Oatly products versus milk generally, and the evidence did not support the broader claim as understood.
- **Other claims overshot their evidence.** A transport comparison overstated the position; a food-industry statistic omitted relevant sectors; and a "climate experts say" line rested on a single expert, with the word "probably" removed from the original quote.
- **One claim survived.** That a universal vegan diet could cut food-related emissions by 49% was *not* upheld — it was judged adequately substantiated. The rigour cuts both ways.

*The lesson is pointed: even when your product very probably **is** better — and Oatly's likely is — the claim must be true as the ordinary reader will understand it. A single-product number generalised to a whole brand is enough for the regulator to step in, however sound the science beneath it.*

ACROSS BOTH CASES, THE SAME PATTERNS RECUR — THE FAILURE MODES TO DESIGN OUT

Failure mode	What it looks like
Vague language	"Eco-friendly", "green" or "sustainable" used with no definition and no supporting evidence.
Hidden trade-offs	Promoting one positive attribute while a significant negative elsewhere is quietly ignored.
False impressions	Statements that are technically true but create a misleading overall picture.
Irrelevant claims	"CFC-free" on products where CFCs are already banned — a meaningless point of difference.
Unsubstantiated claims	No independent verification, no disclosed methodology, no clearly defined scope.

[2] Advertising Standards Authority, ruling on Oatly UK Ltd, published 26 January 2022 (ref G21-1096286), asa.org.uk. Footprint data attributed by Oatly to CarbonCloud; four of five investigated claims upheld.

> *"Good intentions are not a defence. The way a claim is built and evidenced is what determines whether it stands up."*

What good looks like

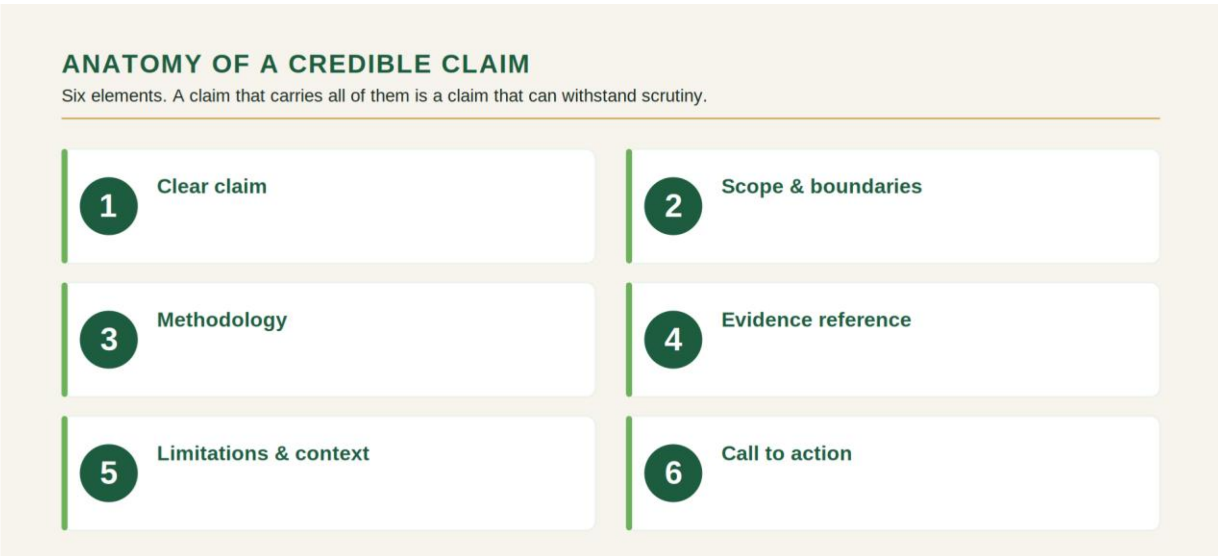
Having seen failure, what does a defensible claim look like? Two things underpin every one: knowing the landscape you operate in and constructing each claim to a consistent anatomy.

THE LEGAL AND BEST-PRACTICE LANDSCAPE (UK)

Framework	What it covers
ASA / CAP Code	Environmental claims must be accurate, substantiated and not mislead by omission. Comparative claims require independent evidence.
CMA Green Claims Code	Six principles: truthful and accurate; clear and unambiguous; omit no key information; fair comparisons; substantiate; whole lifecycle.
Green Claims Directive (EU)	Requires substantiation — and, for some claims, prior verification. Applies if you sell into the EU. "Carbon neutral" and "net zero" labels must meet a verified methodology.
FCA anti-greenwashing rule	Applies to financial products and investment advice. In force since 31 May 2024.
ISO 14021	Self-declared environmental labels and declarations — rules for terms such as 'recyclable' and 'compostable'.
GHG Protocol	The reference standard for measuring and reporting emissions, including Scope 1, 2 and 3 — the baseline for most credible claims.

The six elements of a claim that holds

A claim that carries these six elements can withstand scrutiny. It is, in effect, good scientific method applied to marketing: state your finding, show your working, signpost your evidence.



The anatomy of a credible claim — six elements, from a clear statement to a call to action that doesn't over-reach.

Mind the chain of control

A recurring real-world failure is not in the original claim but in its transmission. A sustainability manager gets the detail right, passes it to a product owner, who passes it to marketing, who — sometimes via an external agency — "jazz it up" for impact. By the time it reaches the world, a carefully bounded statement has been embellished into something the evidence no longer supports. Build a final technical sign-off into the process: before anything is published, it should return to a sustainability lead to confirm that what is being said is exactly what was measured and exactly what was done.

What good looks like, in practice

The Children's Investment Fund Foundation (CIFF) provides a model worth studying.

The Children's Investment Fund Foundation (CIFF) is an independent philanthropic organisation that runs large-scale programmes to improve the survival, health and well-being of children living in poverty in developing countries, alongside climate-focused initiatives.

Drawn from its 2024 annual report, its disclosure is transparent, quantified and carefully worded: it independently measures its emissions, reduces its operational footprint, and buys high-quality carbon credits as a contribution to a global net zero goal. Emissions are assessed to ISO 14064-1:2018 using Defra and DESNZ factors; absolute emissions fell 262 tCO_2e against a 2019 baseline (10.4%); and a mixed portfolio of credits was purchased, either CCP-compliant or under ICVCM assessment.

What makes it work depends on nothing bold: a specific percentage reduction; a defined scope with **no claim of carbon neutrality**; named third-party verification; an openly acknowledged boundary limitation; and evidence signposted, with credits framed explicitly as a contribution. It may be unlikely to trend on social media — but it designed to withstand scrutiny.

The opposite trap: greenhushing

If you are doing good work, why would you not share it? Yet many organisations don't. **Greenhushing** is the deliberate under-communication of sustainability progress — usually out of fear of a greenwashing accusation. The irony is sharp: people greenwash because they fear greenwashing, and they fall silent for the same reason. That silence carries costs that are easy to underestimate.

- **It stalls industry progress.** When credible actors go quiet, only the bold — and often the misleading — are heard.
- **It makes you look like you're doing nothing.** An absence of claims reads, to stakeholders, as an absence of action.
- **It looks weak.** Sustainability-literate audiences, and B2B buyers especially, read silence as a lack of confidence in your own data.
- **It misses commercial opportunity.** Sustainability drives procurement. Be invisible in that narrative and you may never even receive the invitation to tender.

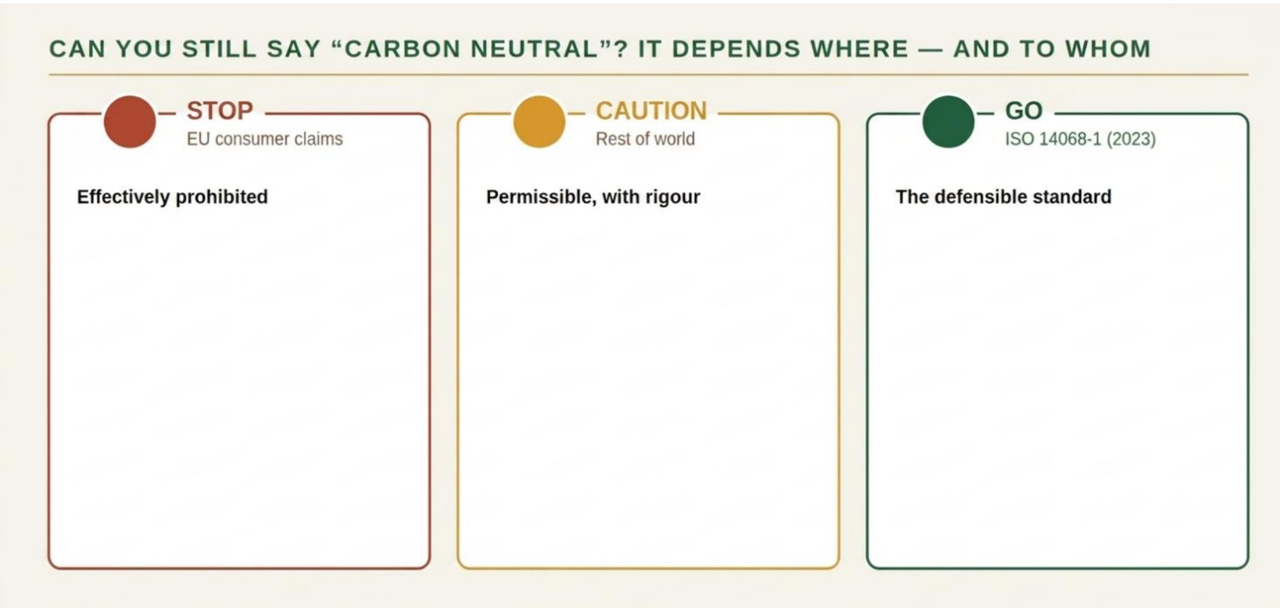
The two traps — and the responsible-visibility path between saying too much and saying too little.

The antidote is not recklessness but responsible visibility. Do the work in the right way and communicate it in the right way, and you have actively mitigated the risk of an accusation — and earned the right to be heard. Peer action is contagious: the more organisations see credible communication from their competitors, the more likely they are to act themselves.

> *"Silence is not the safe option it appears to be. It forfeits trust, tenders and the right to lead your industry."*

Can you still say "carbon neutral"?

This is the question we are asked most often, and the honest answer is: it depends where you are, who you are talking to, and how you say it. A couple of years ago the picture looked very different. Today there is real dissonance between jurisdictions.



Where the term stands today — from an effective EU prohibition to the defensible ground of ISO 14068-1.

The EU restriction is, in effect, a ban on "carbon neutral" on a consumer-facing product label. Importantly, the EU is at pains to stress it is *not* trying to discourage high-integrity carbon credits — it actively supports good projects. The sticking point is the language used to describe them. Because products and communications cross borders freely, the open question is how far the EU position spreads: from B2C to B2B, and from the EU outward. The practical question for you is whether you want to be an early test case. For most organisations, the safer route today is simply to choose different language.

Rather than reaching for a contested label, lead with what is robust and verifiable: **net zero targets** that are verified, credible and publicly disclosed against a reputable standard; for products, a clearly stated CO_2e figure linked to a full public report; for companies, a stated year of assessment linked to the same. A well-designed label cannot carry an essay, but it can condense the essentials and signpost the full methodology via a web link or QR code.

Credit quality: why it matters more than ever

Measurement and reduction are the first two steps; taking responsibility for residual emissions through high-integrity carbon credits is the third. But not all credits are equal. The Integrity Council for the Voluntary Carbon Market (ICVCM) was established to define quality thresholds, and its Core Carbon Principles have become the key global benchmark — assurance that each qualifying credit represents a tonne of carbon genuinely removed or avoided.

Core Carbon Principle	What it requires
Additionality	Reductions that would not have happened without the project.
Permanence	Carbon stored or reduced will not be reversed; forest-based credits must be backed by buffer pools.
No double counting	Credits are uniquely registered and retired — not claimed by more than one party.
Independent verification	Third-party audit of the calculation and the registry entries.
Transition contribution	Credits must support — not substitute for — real decarbonisation by the buyer.
Registry integrity	A transparent, publicly searchable retirement record.

When carbon credits are high-integrity, transparently disclosed and positioned as a contribution to a global net zero ambition rather than a substitute for action, they become a strength in your communications rather than a liability.

Under fire: when a claim is challenged

Even when you have done everything right, someone may still lift the bonnet to check the detail. This is no longer the preserve of corporate affairs; sustainability teams now feel it directly, largely because of social media. Your senior team should have a plan, resting on a simple premise: a shared lie is not the truth. An erroneous accusation shared a few thousand times does not become accurate. The response is evidence, not emotion.

- **Don't panic, don't delete.** Withdrawing a claim immediately can read as an admission of guilt. Pause, hold position, assess precisely what is being challenged.

- **Establish the facts internally.** Pull your methodology documentation, verification certificates and data sources before you respond publicly.
- **Respond with evidence, not emotion.** Acknowledge the challenge, state what the claim is based on, provide the methodology or a link to it.
- **Engage the regulator promptly.** If the ASA or CMA is involved, respond quickly and cooperatively. Delay looks like non-compliance.
- **Update or clarify where warranted.** If the criticism has merit — even partly — update, add context, or voluntarily withdraw while you build stronger evidence.
- **Document everything for next time.** Every challenge improves your playbook.

KNOW THE DIFFERENCE — THE RESPONSE DIFFERS BY TYPE OF CHALLENGE

	Social / media	NGO / campaign	Formal regulator
Nature	Public opinion, often emotional	Organised, evidence-led, media-savvy	Legal process, formal investigation
Timeline	Fast — hours to days	Weeks to months	Months to years
Response	Calm, factual, transparent	Evidence-based, constructive	Full documentation, legal advice
Risk if ignored	Viral, reputational damage	Parliamentary / media escalation	Ruling, withdrawal, fine, naming
Opportunity	Demonstrate credibility	Improve the standard	Set industry precedent

“A shared lie is not the truth. The response to challenge is evidence, not emotion.”

Our view

We actively encourage our clients to communicate their sustainability performance — done properly. A good claim is evidence of a good programme, and good programmes deserve to be seen. Four principles summarise our position.

- **Communicate progress, not just targets.** Measured, verified reductions deserve to be said out loud. No one expects a finished product — what matters is honesty about where you are and where you plan to be.
- **Claims drive accountability.** Going public creates internal pressure to maintain and improve. Silence removes that discipline.
- **Show the process, not just the outcome.** Explaining how you measure, verify and improve is as powerful as the headline number. It is the story of credibility.
- **Set realistic interim targets.** Avoid the knee-jerk “50% by 2030, 90% by 2050” if you cannot evidence the path. An over-stretched target you then miss disengages your organisation — and is obvious to outsiders.

Say what you do, do what you say, prove it, disclose it, and keep improving.

SIDEBAR · THE PRE-PUBLICATION CHECKLIST

Run every sustainability communication through these ten questions before it is published. If you cannot answer "yes" to each, the claim is not yet ready.

1. Is every claim specific and bounded — product, site, company or supply chain?
2. Can you point to independently verified data for every quantitative claim?
3. Have you disclosed what is NOT included in the scope?
4. Have you named the measurement standard or methodology?
5. Is any "carbon neutral" language EU-appropriate, or restricted to non-EU markets?
6. Are any carbon credits ICVCM CCP-aligned and verifiably retired?
7. Is aspirational language clearly labelled as future targets, not current fact?
8. Has legal or compliance reviewed the final copy?
9. Is a documented methodology pack ready in case the claim is challenged?
10. Does the claim link to, or reference, supporting evidence at the point of use?

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