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School of Fashion and Textiles

Inquiry into Greenwashing
Submission to Senate Standing Committees on Environment and Communications
Unclassified

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About us

RMIT's School of Fashion and Textiles is a global leader in fashion and textiles education, spanning technology, design, and enterprise. Informed by an astute knowledge of industry, our staff are engaged as both practitioners and researchers. The school's research expertise includes material technology, fashion design, supply chain management, sustainability. The following submission is made from School representatives with expertise in fashion design, sustainability, and textile technology, and arises from a discussion forum with contributions from across the school community of designers, scientists, and social science and humanities researchers.

Artwork 'Luwaytini' by Mark Cleaver, Palawa

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1. Introduction and overview of key issues

Our submission's focus is on greenwashing within textiles, clothing, and footwear (TCF) industries. RMIT's School of Fashion and Textiles strongly supports the Senate inquiry, recognising that the TCF industries are especially prone to greenwashing. As the recent scan by the Australian Competition and Consumer Commission (ACCC) identified, two-thirds of the TCF businesses examined were found to be making concerning claims. We welcome the renewed focus of both the ACCC and the Australian Securities and Investments Commission (ASIC) in taking action to combat greenwashing.

1.1. The environmental and sustainability claims made by companies in textiles, clothing, and footwear and why greenwashing is common in these industries

Greenwashing refers to companies making false or misleading environmental claims, and 'bluewashing' refers to companies making false or misleading social sustainability claims. There are three types of deceptive practices most relevant to TCF industries: false claims, omissions, and paltering (see this article). False claims are easier to identify given that they are made based on an untrue, unverifiable, or irrelevant fact. However, omission and paltering are more difficult to address. In omission, brands avoid mentioning their weaknesses, while in paltering, they focus on minor achievements to create a misleading image of environmental sustainability. Below, we identify five factors which lead to greenwashing in the TCF industries through false claims, omission, and paltering.

1.1.1. The product life cycle

TCF supply chains have numerous intersecting sustainability issues across the entire product life cycle, from cradle (raw material) to grave (end-of life). The life cycle stages of textiles and clothing follow from the raw material stage, yarn formation, textile knitting or weaving, product/garment construction, distribution, and retailing. Within a fashion context, the complexity of these stages varies across categories: compared to clothing, footwear typically comprises 10 times the number of materials and components and involves highly complex manufacturing processes. Additionally, after purchase, consumers are responsible for utilising and maintaining their products until they are eventually discarded, either to be disposed of in landfills or given a second or third life through reuse by another individual. The complexity of a TCF product's life cycle, with diverse sustainability impacts at every step of production, use, and disposal phases, means it is very difficult for brands and retailers to take and communicate meaningful action in all phases. This complexity also means it is easy for a company to highlight positive action in one area, while omitting their lack of action elsewhere. Very few products advise consumers what to do at the end of the product's life cycle, therefore, the decision of whether to repair, recycle or dispose is left up to the consumer.

The complete product life cycle of TCF items has also been difficult to assess due to the wide variety of materials that are used, many in combination, and the new material innovations that enter the market (e.g., Piñatex ® and Mylo™ vegan leathers). TCF items are commonly marketed as 'sustainable', 'conscious' or 'responsible' based purely on their material components. This represents a very pervasive and subtle type of greenwashing, conveying that a product is 'sustainable' once certain materials are used (or alternatively, excluded), whilst failing to consider the entire product life cycle, including anticipated number of uses, care during use, whether the item is easily repaired and end of life recycling, disassembly, or disposal (Appendix B).

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To date, accurate data on the full life cycle of many materials used in TCF products is difficult to obtain, and ecological impact myths are pervasive, even for Australian produced fibres such as cotton (see this report). Assumptions by brands and consumers are also problematic, e.g., that all natural materials or natural fibres are biodegradable. Recently, issues around TCF products labelled as bamboo have garnered media attention (see this article), as consumers and brands have been assuming that bamboo is a natural fibre, when in reality, what has been labelled as 'bamboo' is viscose fibre, a semi-synthetic fibre which has undergone numerous chemical treatments. The marketing claims of bamboo products was centred around the inherent properties of bamboo; such as anti-bacterial, anti-fungal, breathable, absorbent, odour resistant and UV protective (see examples of bamboo marketing claims in clothing and bedding). These properties are unlikely to be retained after intensive chemical treatment and processing, and therefore, need to be substantiated with evidence.

1.1.2. Global problems addressed by numerous certifications, a lack of transparency

TCF industries have global supply chains, with fibre grown in one country, manufactured into textiles and clothing in several other geographic locations, before being distributed around the world. The highly globalised, poorly regulated nature of the industry has meant that over 100 voluntary certifications have emerged to address sustainability issues. However, as this report shows, these certifications have varying degrees of credibility and some of their methodologies are contested. This means that claims are difficult for consumers to substantiate as credible. The problem will worsen as demand for certification increases due to the introduction of legislation. Even reputable certifications can be used in a deceptive way and therefore, contribute to greenwashing. For example, H&M's misleading use of the Sustainable Apparel Coalition's Higg Index has led to the company being sued for greenwashing. The industry's opaque supply chains have led to calls for transparency and traceability to reveal the environmental and human rights abuses that may be occurring.

1.1.3. The industry's proclivity for storytelling

The nature of the fashion industry is to market 'dream worlds' to consumers – meaning that storytelling and branding can be more important than the physical product. As consumers increasingly desire a more sustainable world, the fashion industry will 'sell' consumers this vision through imagery and language that evokes a sustainable future. A certain segment of values driven, eco-conscious consumers have made shifts towards purchasing more sustainable fashion products. The TCF industries have responded to capitalise on this opportunity by appealing more to these eco-consumers, as well as to external pressure, which perceives the fashion industry as one of the world's leading polluters. Many companies are now seeking to gain a competitive advantage by positioning themselves as 'green' or 'responsible'. Whilst some companies are seeking to make authentic environmental business decisions, others perceive sustainability within fashion as just another trend to be adopted, or a new marketing angle. Therefore, the fast pace of trend-driven fashion compromises the ability of brands to properly research and validate their sustainable practices and claims. A lack of access or ability to discern credible information can also lead to misleading or assumptive claims. While deceptive marketing practices intended to drive sales certainly exist (and should be called out), environmental claims can also be a result of a lack of understanding and knowledge on the part of the brand.

1.1.4. Industry fragmentation

Globally and in Australia, the TCF industries are highly fragmented, without dominant players and with many thousands of individual companies placing product on the market, all with their own story

to sell. For example, according to IBISWorld, there are over 16,000 companies retailing clothing in Australia alone, of which 88% are small-to-medium enterprises (SMEs). With so many companies involved, there is little agreement on definitions of key terms related to sustainability, and any enforcement of green claims becomes very difficult in the absence of regulations.

As a result of a long and fragmented supply chain, brands may be reliant on information passed onto them from other points in the supply chain. This requires a great deal of trust on the part of the brand that the information provided to them is true and accurate. A fragmented and largely offshore TCF supply chain puts brands at risk on the traceability aspect during sourcing and manufacturing.

1.1.5. 'Greenhush'

A related issue facing the TCF industries is the phenomenon of staying silent on sustainability. Companies who have been subject to boycotts or protests can be disinclined to share their sustainability initiatives because of the fear of being accused of greenwashing. As this article discusses, this effect is known as 'greenhush'. Concerns raised in response to the EU's recently proposed Green Claims Directive suggest that harsh legislative penalties may also stymy progress towards sustainable goals. Consequently, some businesses may conclude that it is more cost effective for them to restrain from the environmental claims made. Given the sheer complexity of acting on sustainability issues, it is not surprising that companies choose to be silent, rather than be found guilty of omitting or paltering. Like greenwashing, greenhushing is also a cause for concern, as it keeps consumers uninformed about genuine progress and does not foster an open dialogue between producers and consumers.

1.2. The impact of misleading environmental and sustainability claims on consumers

The breadth and scale of the problem of greenwashing poses real issues for consumers who cannot become experts in every aspect of raw materials, components production, supply chains and waste management. The recent Australian Ethical Consumer Report found that Australians are increasingly seeking to make conscious purchases, with 62% more aware of the impact of their purchasing decisions, and 42% agreeing they plan to change their habits. A 2021 study also shows Australian consumers are overwhelmed by the numerous ethical and environmental decisions involved in purchasing clothing. A better alternative is for consumers to focus less on buzzwords and catch phrases. They need to have access to reliable and current data explaining these terms, and how they are misused in the advertising and promotion of products (Appendix B). To make more informed purchasing decisions, consumers also need to be aware of cases where brands have been found to offer misleading statements related to minimising environmental harm. At a minimum, consumers need to be able to understand the full environmental impact of the garment, textile, or footwear. Decisions to purchase should be informed by considering the anatomy of claims, relating to the less negative or even positive impact of a product or service environment. As mentioned above, greenhushing can also have a negative impact on consumers, as it leads to a lack of transparency about company actions.

1.3. Domestic and international examples of regulating clothing and footwear companies' environmental and sustainability claims

The EU's substantiating Green Claims Directive: The European Union has recently released a Green Claims Directive that sets the framework for substantiating green claims. Importantly, the Green

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Claims Directive is positioned within the EU's robust legislative framework for environmental stewardship, which includes directives and regulations such as the Carbon Removals Certification Regulation, the Ecodesign for Sustainable Products Regulation, supported with legal provisions for both mandatory and voluntary labelling systems which include the EU Ecolabel, the Eco-Management and Audit Scheme, and the Regulations on organic farming label.

Specific to clothing and textiles, the EU's Sustainable and Circular Textile Strategy provides a holistic suite of policies to address issues across the product life cycle, including extended producer responsibility, eco-design, the digital product passport for transparency and traceability, and banning the destruction of unsold stock. The Green Claims Directive is therefore one pillar of a wider strategy.

The UK Green Claims Code: the UK's Competition and Markets Authority (CMA) aims to protect consumers from greenwashing. Their code includes both business-to-business and business-to-consumer green marketing. In addition to enforcing the code through court action, the CMA is supported by the Advertising Standards Authority (ASA), the UK's independent advertising regulator.

Here in Australia, the ACCC and ASIC have signalled increased action on greenwashing and developed guidelines and reports detailing best practices for businesses and consumers (Appendix C). The TCF industries are working within a global supply chain, and it may benefit Australia to look to the European Union, where extensive research and development have also been undertaken, to take a similarly holistic view to addressing sustainability issues including greenwashing with these industries.

1.4. Advertising standards in relation to environmental and sustainability claims by clothing and footwear companies

The ACCC 2011 Green Marketing Report provides guidance for advertising and suggests that companies consider the full product life cycle. ACCC advises companies to be wary of using the words such as 'green', and 'environmentally friendly'. As the guidance notes, "*firms which make environmental or 'green' claims should ensure that their claims are scientifically sound and appropriately substantiated. Consumers are entitled to rely on any environmental claims you make and to expect these claims to be truthful*" (ACCC 2011). The challenge here is not that standards are needed, but that enforcement is very difficult, given the complexity of the sustainability issues under discussion and the diversity of the sector.

1.5. Legislative options to protect consumers from greenwashing in Australia

Australian Consumer Law (ACL) already has options in place to protect against false or misleading claims, however, does not explicitly refer to the full product life cycle. ACCC guidance on interpreting ACL states that claims need to: be honest and truthful; detail the specific part of the product or process it is referring to; use language the average member of the public can understand; explain the significance of the benefit; and be able to be substantiated. Penalties can be up to $1.1 million for companies and $220,000 for individuals (ACCC 2011). ASIC (Australian Securities and Investments Commission) cases and legislative authority are also recent examples of investor and consumer protection.

2. Recommendations

Recommendation 1: Establish definitions of key terms using a circular economy and life cycle framework

The discussion around greenwashing needs to be framed within a circular economy framework, considering the entire life cycle of a product from production, to use and to disposal. This means that claims are not being made in silos. A circular economy for TCF manufacturing is about designing out waste and pollution, keeping products and materials in use for longer, and regenerating nature. Decisions that support circularity include the following R-strategies of *refuse, rethink, reuse, repair, remanufacture, recycle,* and *recover*. The first of these, '*refuse*' would encourage consumers to consider whether they need to purchase the item in the first place.

The problem with sustainability terms used within the TCF industry is that marketing is happening in real time and in places that appear immune to regulation (for example social media marketing via Instagram or TikTok). As a result, marketing teams can invent new 'buzzwords' to encourage consumers to choose products based on an individual's personal values. These companies are therefore, utilising consumer's desire to make purchases that have the least impact on the environment. Examples of some common terms used to greenwash appear in Appendix A. These terms are deliberately oversimplified and when used to promote products or services, should be combined with clear statements explaining the reasons for the claim being truthful rather than simply based on divergent facts that can be misleading. For example, vegan leather materials may be claimed to be durable up to 70,000 cycles for flex resistance. However, in the context that shoes may take 10,000 steps a day, this equates to a plausible durability standard of seven days (personal communication with a local retailer). Key problems for consumers that might be addressed as a part of actions from this response centre on clear information, reliable sources of information, contextual information about how a claim is being substantiated and consumer knowledge of the systems and processes upon which the claim is reliant.

A useful way to consider the practice of making claims is to establish the 'anatomy of a claim'. For example, a claim might take the form of one of the common greenwashing terms such as 'environmentally friendly.' To avoid greenwashing, the claim should be supported by information outlining 1. the basis for the claim, 2. evidence to support the claim and 3. contexts relevant to the claim and even include 4. disclaimers and 5. time relative information.

Recommendation 2: Streamline processes for reporting cases of suspected greenwashing

The ability for consumers to report cases of greenwashing is hindered by the complexity of the ACCC reporting processes (Refer to Appendix C). A lack of consumer engagement with the reporting process leads to a reduced quantity of reliable data about the frequency, scale, and nature of greenwashing within the Australian context. The language surrounding claim-making should be carefully considered for its inherent ability to discourage misleading or deceptive claims.

While corporate fines and public reprimands are one strategy to discourage greenwashing, a collaborative approach may provide an alternative or complementary strategy to encourage best practices and the sharing of knowledge. Initiating a "#greenwashing?" campaign could effectively gather data on the suspected prevalence of greenwashing practices in the Australian market. Simultaneously, it would encourage brands to participate in open discussions and provide evidence

to substantiate their environmental claims. This grassroots movement would empower citizens to conduct micro-scale, cost-free investigations as consumers, aiming to either validate or debunk the claims made by businesses. Brands might be encouraged to examine environmental claims being made by offshore suppliers that are not governed by the same policy or law as Australian manufacturers and suppliers. A link to information on how to make a claim should also be included on product labels. These kinds of collaborative approaches may also mitigate the risk of greenhushing, that can arise from strict and punitive legislation which, in any case, tend to have a negligible impact on the biggest corporations that care more about their reputation, than the financial penalties.

Recommendation 3: Independent expert bodies to offer guidance for consumers and industry

The specialist nature of the TCF industries in Australia calls for an industry-specific independent body to review and verify claims. This should encompass experts across the entire supply chain with knowledge of jargon, commonly used to make tenuous claims that are not understood by consumers. At the very least, where a brand is planning to make a claim based on secondary sources, claims could be submitted for verification before being made within the public arena. The service of claim review should be at a minimal cost to micro and SMEs, subsidised by higher fees for large corporations. The reality of the fast pace at which the TCF industry creates and delivers products may make it difficult for brands to comply with claims verification before products go to market. In this instance, the facilitation of a system to monitor greenwashing through means such as the use of technology or consumer reporting may work in conjunction with more formal verification. There are some existing bodies operating within Australia that can collaborate on system monitoring processes, such as:

- Independent Australian non-governmental organisations that consumer education role such as Good on You and Ethical Fashion Report
- Standards Australia and its link to the International Standards Organisation
- Textile Institute Australia Section
- Australia's National Clothing Product Stewardship Scheme will include citizen behaviour change and circular design as part of its remit to support the industry's transition to a circular economy. The scheme can play a role in educating consumers and combatting greenwashing through these activities.
- Australian Fashion Council
- Australian Wool Testing Authority (AWTA)
- The Cotton Research and Development Corporation (CRDC)

We must begin with the assumption that consumers know almost nothing about TCF production and are reliant on labelling to make informed purchasing and end-of-life clothing decisions. Existing organisations such as Good on You and the Ethical Fashion Report have filled this gap by offering consumers a way to navigate these issues. However, these systems need to be harmonised, overseen, and validated. At present, much of the onus is on the consumer to inform and educate themselves. Given the numerous organisations and certifications used to evaluate products within the TCF industry, this is a burden unfairly carried by the consumer. However, these organisations only evaluate brands producing new products. There are many sustainable alternatives to buying new, and the transition to a circular economy requires consumers to consider strategies of *refuse*, *re-use,* and *repair* before purchasing new. Initiatives such as *Seamless*, the National Clothing Product Stewardship scheme, which seeks to convene industry around addressing the environmental problems of the TCF industries, are a good place to start.

Recommendation 4: Consider SMEs in fashion and textiles industries

A concern raised during the preparation of this submission was that it was undesirable to disadvantage micro and SMEs which may have made false claims based on secondary information through secondary sources along the supply chain. An inclusive and collaborative approach to identify and then minimise the ongoing practice of greenwashing for fashion and textile micro and SMEs, may be critical in addressing greenwashing.

There may also be a problem for individuals in reporting small or micro businesses who are greenwashing without awareness. For example, they may be severely impacted by a complaint where they are relying on potentially misleading statistics or data, or information provided by suppliers about processes that they do not understand. More transparency about the type of evidence required to support a common list of claims could protect smaller businesses in these cases. Developing a directory of case studies based on industry examples would be a vital resource for smaller businesses in understanding how to avoid greenwashing.

Future development of policy and frameworks surrounding sustainable business and environmental claims should consider the spectrum of different business structures within Australia, from sole trader, micro to small business, to public company or global corporation. It is also important to recognise that one-size-fits-all standards across the TCF industries may not be appropriate. The production of footwear, for example, has more in common with the manufacturing of cars than that of T-shirts. Therefore, the standards guiding appropriate practices for clothing may not adequately prevent misleading footwear claims. Interventions need to be relevant to scale and product category while incorporating inclusive and collaborative responses, rather than purely focusing on a punitive approach.

3. Future research and investment options

As a part of this submission, we make the following recommendations to minimise the practice of greenwashing within the TCF industries in Australia.

- **Living Glossary:** Develop a living glossary of characteristic terms used in greenwashing. This glossary should be regularly updated to include new terms and trends in the industry. Collaborate with experts, NGOs, and consumer advocacy groups to ensure accuracy and comprehensiveness.
- **Research on Consumer Perceptions:** Conduct qualitative and quantitative research to understand consumer perceptions of greenwashing terms. This can include focus groups, surveys, and interviews to gather insights into how consumers interpret and respond to different environmental claims. This research can be used to educate consumers about misleading practices and empower them to make informed decisions.
- **Technology to Combat False Claims:** Explore opportunities to leverage technology to identify and combat greenwashing. Investigate the use of artificial intelligence and machine learning algorithms to analyse marketing claims and identify patterns that indicate potential greenwashing. This can help consumers and regulatory bodies in detecting and challenging false environmental claims.
- **Transparent Information Platforms:** Establish platforms where consumers can find detailed information about cases of greenwashing. Collaborate with industry experts, NGOs, and regulatory bodies to create a centralized database or website that provides clear and credible information about companies and their environmental practices. Ensure the platform is accessible, user-friendly, and regularly updated.
- **QR Codes and Tracing Systems:** Utilise QR codes or other tracing systems to empower consumers in making informed decisions. Companies can provide QR codes on product

labels, advertising campaigns and social media that link to detailed information about the product's environmental impact, certifications, and supply chain transparency. This enables consumers to verify claims and make conscious choices.

- **Citizen Science Engagement:** Engage citizens in researching and understanding dynamic practices like greenwashing through citizen science initiatives. Encourage consumers to report suspicious claims, share their experiences, and participate in data collection efforts. This collaboration can contribute to a broader understanding of greenwashing practices and strengthen consumer advocacy.
- **Collaboration with Regulatory Bodies:** Collaborate with regulatory bodies to strengthen regulations and enforcement against greenwashing. Advocate for clear guidelines and standards for environmental claims, ensuring they are robust and easily understandable. Engage in dialogue with regulatory bodies to share research findings and recommendations for more effective measures against greenwashing.

4. Conclusion

A group of consumers within Australia who are trying to 'do the right thing' might be mobilised through technology and communication to actively engage with research teams and policy makers. Providing clear information about the appropriate use of environmental claims, and the ethics for making claims should also be a focus for the government. More research into consumer perceptions of environmental claims and the role they play in influencing consumer behaviour is also needed.

Establishing an autonomous organization dedicated to overseeing education and research on businesses' environmental claims, as well as providing recommendations for legal action, would communicate to both companies and consumers the urgency and importance of adopting best practices in achieving environmental sustainability within the business sector.

TCF businesses will need government support and expert advice to transition to truly sustainable business practices, which may include rethinking traditional 'business as usual' and 'product sales growth only' approaches. The practices needed to transition towards true sustainability must take a holistic view of the entire product life cycle, not just material choice.

Specialist areas within the TCF industry need to be supported with expert advice relevant to their business activities and area of the larger categories such as 'fashion' and 'textiles'.

The growing sector of repair and servicing businesses should be encouraged as a viable option for consumers over any claims being put forward for newly produced products. We discussed how this might be a part of enabling consumers to make informed decisions that include options supporting a circular economy. The new National Clothing Product Stewardship Scheme, Seamless, can play a role here.

The problem of greenwashing is growing in the TCF. With the imperative to address sustainability comes a heightened risk of greenwashing. By implementing these recommendations, we can work towards reducing greenwashing practices, empowering consumers with accurate information, and promoting transparency and sustainability in the marketplace.

Thank you.

Submission authors

Professor Dr Alice Payne

Dr Alice Payne is a Professor and Dean of the School of Fashion and Textiles at RMIT. Her research focuses on environmental and social sustainability issues throughout the life cycle of clothing. Her recent work has examined labour issues in the cotton production value chain, together with technologies to address the problem of textile waste. Professor Alice is part of the Australian Fashion Council-led consortium designing the National Clothing Product Stewardship Scheme. She is author of the book *Designing Fashion's Future*, co-editor of *Global Perspectives on Sustainable Fashion*, and is an award-winning designer and educator.

Dr Angela Finn

Dr Angela Finn – Senior Lecturer Fashion Design, RMIT University. Pronouns: She/Her. Angela is a fashion designer and maker, fashion educator, fashion researcher and creative practitioner researcher. Her research presentations and publications are in the areas of Sustainable Fashion Design and Manufacturing, Creative Practice Research Methods, and Tacit Knowledge Transfer. Angela lives and works across Wathaurong, Woiwurung and Boonwurrung Lands, Melbourne/Naarm, Australia.

Dr Saniyat Islam

Dr Saniyat Islam is a Senior lecturer in Fashion Enterprise and Sustainable Innovation at School of Fashion and Textiles with expertise in Textile Materials and Polymer Science. Saniyat is currently researching Circularity in materials and Business models, Blockchain innovation for Fashion Enterprises, Sustainable materials, and supply-chain traceability and transparency.

Dr Rebecca Van Amber

Dr Rebecca Van Amber is a Senior Lecturer in the School of Fashion and Textiles at RMIT University, and is an expert in textile materials, sustainability, research and development, and methods to design out waste in the Circular economy for Fashion. Rebecca was a winner of the 2017 H & M Foundation's Global Change award's innovation challenge.

Dr Alexandra Sherlock

Dr Alexandra Sherlock is a lecturer in the School of Fashion and Textiles at RMIT. She is also a member of RMIT's Academic Board and the founder of the Footwear Research Network. Alex's research intersects the fields of sociology, anthropology, and fashion theory. Using footwear as a lens, she explores the relationship between bodies, cultures, societies, and the environment.

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5. APPENDIX

A. Examples of common terms used in greenwashing

The following table summarises some of the most common terms uses and provides a brief explanation and example of how the term might be used. This is not a definitive list but speaks more to the nature of greenwashing and how it is being used across different areas of the market.

Terminology	Description	Example
Eco-friendly or Environmentally Friendly	These are overly broad terms that are not regulated, meaning companies can use them freely without needing to prove their claims.	A footwear company claims their packaging is "eco-friendly" because its made from recycled materials.
Sustainable	This is another term that sounds good but lacks a clear, universal definition. It can refer to many different practices, so it is often used by companies to appear more environmentally conscious than they really are.	A clothing brand labels a line of their clothing as "sustainable" because they use organic cotton. However, organic cotton describes specific on-farm practices, not all the practices beyond the farm gate, which may or may not be sustainable.
Green	Like "eco-friendly," the term "green" is not regulated and can be used to describe anything from products to policies to entire companies.	A clothing company refers to their brand as "green" or "responsible" because they have installed solar panels in their stores.
Natural	This term can be misleading because it implies that a product is inherently good for the environment, even though many "natural" substances can be harmful.	A clothing product is labelled as "Natural" because it uses natural based dyes that do not contain artificial colours. However, the natural dyeing process uses powerful mordants such as Potassium Aluminium Sulphate.
Organic	While this term is regulated in some industries (like food), in others it can be used more freely. And even when a product is organic, that doesn't mean it's necessarily better for the environment than a non-organic equivalent.	A fashion product is labelled as "Organic" because it contains organic cotton fibre. The fibres may be organically farmed, but have other components, such as thread or screen print ink, that are not organically produced.

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Biodegradable/Bio	This term can be misleading because almost anything can biodegrade given enough time. In some cases, so-called "biodegradable" products simply break down into microplastics which are still harmful to the environment.	A plastic product is labelled as "Biodegradable" without a clear timeline on how long it would take to degrade. In the case of polyester this may take 20-200 years but also cause serious environmental problems during the process.
Compostable	This term is often used interchangeably with biodegradable and means that the item is derived of organic materials and can be included in composting.	A company may advertise a product that is compostable because it is made of natural fibres (e.g. cotton, linen, wool, hemp, etc.), but the garment may include non-compostable components (e.g. sewing threads), or in the case of wool, it may be shrink proofed, which means the wool has a polymer (plastic) coating to prevent felting and shrinkage, which may not allow it to compost properly.
Chemical-free	This is a misleading term because everything, including water and air, is made of chemicals. Often, companies use this term to imply that their products are safer or more natural than they really are.	A handbag company claims their product is "Chemical-free" because they did not use synthetic materials in its production. However, the raw materials may have used harmful chemicals in their development.
Clean	This term is often used to describe energy sources, but there's no universal definition of what constitutes "clean" energy.	An energy company refers to their electricity as "Clean" because it is generated from natural gas, a less carbon-intensive fossil fuel than coal fired power generation. However, natural gas is classified as a fossil fuel and is a non-renewable resource.
Recyclable	Just because a product is recyclable doesn't mean it will be recycled. And even when products are recycled, the process often uses significant energy and resources.	A clothing company labels their clothing as "Recyclable," even though they are made from a type of materials that cannot be recycled in Australia with current infrastructure. This can mean that waste is shipped to developing countries for processing at a higher environmental cost than materials that can be locally processed.
Zero Waste	This phrase can be misleading as it often only considers the waste created at the end of a product's life, not during its production.	A company claims to be using "Zero Waste" because their product is designed to be reusable, but they do not consider the waste generated during the product's manufacturing process.

Carbon Neutral	While some companies do take steps to offset their carbon emissions, this term can be misleading if it is not clear what actions the company is taking or if those actions are enough to truly balance out their emissions.	A claim to be "Carbon Neutral" because they buy carbon offsets, but they continue to use materials made from petrochemical by-products.
Ethical	This term is used to indicate that a product or company operates in a way that is fair and just, often referring to labour practices or sourcing methods. However, without a clear definition or standard, it can be used misleadingly.	A fashion brand labels their clothing as "Ethically Made" but doesn't provide specific details about their labour practices or working conditions.
Responsible	"Responsible" often implies a degree of social or environmental accountability, but lacks a standard definition, allowing it to be used loosely.	A coffee company markets its beans as "Responsibly Sourced," but doesn't provide details about the farming practices or labour conditions involved in its production.
Circular	This term refers to the circular economy model, where resources are kept in use for as long as possible. However, it can be misleading if a company fails to implement or explain comprehensive strategies to close the loop.	A company claims to follow a "Circular Model" by recycling materials but doesn't account for the energy and resources used in the recycling process.
Bioplastic	This term refers to plastics derived from renewable biomass sources, but its environmental impact can vary widely based on how it's produced and disposed of.	A company advertises a product as made from "Bioplastic," implying it is more eco-friendly, but does not mention it may still contribute to pollution if not composted properly.

B. Appendix – Claims about a T-Shirt

Diagram of T-Shirt showing greenwashing examples that can happen at each life phase with emphasis on those that negate environmental claims.
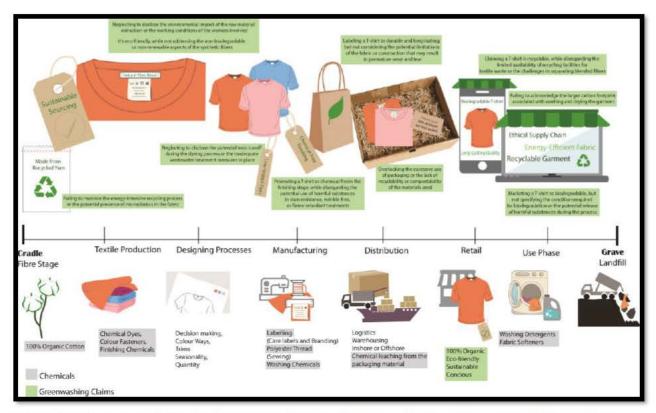
Figure 1: Diagram showing greenwashing claims at various stages of the garment lifecycle by *Aayushi Badhwar*

Here are examples of greenwashing claims that can be made for a T-shirt, covering various phases of its life cycle, and emphasising those that negate environmental claims:

Raw Material Phase:
1. "Sustainable Sourcing" - Labelling a T-shirt as sustainably sourced, while neglecting to disclose the environmental impact of the raw material extraction or the working conditions of the workers involved.
2. "Natural Fibre Blend" - Promoting a T-shirt made from a blend of natural and synthetic fibres, suggesting it is eco-friendly, but not addressing the non-biodegradable or non-renewable aspects of the synthetic fibres.

Yarn and Fabric Phase:
1. "Recycled Yarn" - Highlighting a T-shirt made from recycled yarn however, failing to mention the energy-intensive recycling process or the potential presence of microplastics in the fabric.

Colouration and Finishing Phase:
1. "Low-Impact Dyes" - Advertising a T-shirt dyed with low-impact dyes, but not disclosing the potential toxic runoff during the dyeing process or the inadequate wastewater treatment measures in place.
2. "Chemical-Free Finishing" - Promoting a T-shirt as chemical-free in the finishing stage, while disregarding the potential use of harmful substances in stain resistance, wrinkle-free, or flame-retardant treatments.

Retail Phase:
1. "Sustainable Packaging" - Advertising a T-shirt packaged in sustainable materials but overlooking the excessive use of packaging or the lack of recyclability or composability of the materials used.
2. "Ethical Supply Chain" - Highlighting a T-shirt produced in an ethically responsible supply chain yet failing to provide evidence or certifications verifying fair wages, safe working conditions, or worker rights.

Use Phase:

1. "Energy-Efficient Fabric" - Promoting a T-shirt claiming energy efficiency in everyday wear, without acknowledging the larger carbon footprint associated with washing and drying the garment.
2. "Long-Lasting Quality" - Labelling a T-shirt as durable and long-lasting, but not considering the potential limitations of the fabric or construction that may result in premature wear and tear.

End of Life Phase:
1. "Biodegradable T-shirt" - Marketing a T-shirt as biodegradable, but not specifying the conditions required for biodegradation or the potential release of harmful substances during the process.
2. "Recyclable Garment" - Claiming a T-shirt is recyclable, while disregarding the limited availability of recycling facilities for textile waste or the challenges in separating blended fibres.

These examples aim to highlight common greenwashing tactics across distinct phases of a T-shirt's life cycle, focusing on aspects that negate genuine environmental claims. One key element to remember here that claims made in one aspect of the lifecycle can be nullified by the following life phase the item goes through. A critical example can be a T-shirt made from organic cotton if gone through coloration and finishing process may not be in 'organic' anymore, therefore, any claims made on the raw materials organic nature would be invalidated.

The T-Shirt was chosen as an iconic clothing item that appears familiar and is relatable to most people. This clothing item is considered one of the simplest yet even a basic garment reveals the complexity and potential for greenwashing along the supply chain. The hope is to highlight how complexity and opportunity for greenwashing increase alongside the number of materials and components used to create more complex items, especially more complex tailored garments, and footwear.

By raising awareness about such claims, consumers can make more informed choices and demand transparency and sustainability in the fashion industry.

C. Appendix – Current guidelines

Current guidelines state that environmental claims should have the following characteristics outlined in the ACCC report "Green marketing and the Australian Consumer Law" (2011, p.7):

1. be honest and truthful (not exclude damaging information or overstate facts)
2. detail the specific part of the product or process it is referring to (including being transparent about time sensitive claims)
3. use language which the average member of the public can understand (and avoiding buzzwords that are not supported with relevant evidence and information in relation to the specific product)
4. explain the significance of the benefit (how will this claim benefit the environment? Impact for the environment resulting from this purchase).
5. be able to be substantiated (based on facts not opinions)

Another key problem for Australian consumers is the lack of ease of access to information surrounding claims of greenwashing being made and the complexity for consumers who believe they have been misled in even making an initial claim. At present, the process is convoluted, and leans towards protecting brands and companies from unsubstantiated claims and dissuading individual consumers from making a complaint.

For example: The process for making a claim to the Australian Competition and Consumer Commission (ACCC) is outlined on their website and involve:

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1. Gather Information: Document everything related to your claim. This could include receipts, contracts, advertisements, and any communication with the company. In the context of greenwashing or misleading environmental claims, this could include the company's marketing materials, product packaging, or any specific claims made on their website or social media.

2. Contact the Business Directly: Before contacting the ACCC, it is usually recommended to contact the business directly. Explain your concerns and give them an opportunity to address the issue. If the business does not resolve the issue to your satisfaction, you can then proceed with lodging a complaint with the ACCC.

3. Lodge a Complaint with the ACCC: You can do this online using the ACCC's complaint form. Include as much detail as possible and attach any relevant documentation. If the ACCC needs more information, they will contact you.

4. ACCC Assessment: The ACCC will assess your complaint. They may not respond to individual complaints directly, but they use the information to help them understand the behaviour of businesses and where problems may be arising that require action.

5. Possible Outcomes: The ACCC has a range of options at its disposal if it finds a business has breached Australian Consumer Law. This can include fines, injunctions, declarations, corrective advertising, and more. However, it is important to note that the ACCC cannot award compensation or force a business to provide a refund - you would need to pursue these through a tribunal or court.

6. Further Action: If you are seeking compensation, you may need to take further action, such as going to your state or territory's consumer protection agency or taking the matter to a tribunal or court.

D. Appendix – References and Further Reading

- ACCC. 2011. Green marketing and Australian consumer law: Australian Competition and Consumer Commission, Commonwealth of Australia. Accessed 8 March 2012. https://web.archive.org/web/20120327115739/http://www.accc.gov.au/content/item.phtml?itemId=815763&nodeId=90c89998139b822f949e69e227917455&fn=Green%20marketing%20and%20the%20ACL.pdf

- ACCC. 2023. Greenwashing by businesses in Australia Findings of the ACCC's internet sweep of environmental claims https://www.accc.gov.au/system/files/Greenwashing%20by%20businesses%20in%20Australia.pdf

Artwork 'Luwaytini' by Mark Cleaver, Palawa

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