



# *Initial Research Report: Sustainable policies with impact in footwear and apparel Industry*

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## ACRONYMS

APICCAPS	Associação Portuguesa dos Industriais de Calçado, Componentes, Artigos de Pele e seus Sucedâneos
BCI	Better Cotton Initiative
CM	Cradle to Cradle Certified
COM	Communication
CSOs	Civil Society Organizations
CSRD	Corporate Sustainability Reporting Directive
EC	European Commission
EMAS	EMAS: European Eco-Management and Audit Scheme
EU	European Commission
ESG	Environmental, Social and Governance
GHG	Greenhouse Gases
GRS	Global Recycled Standard
LAs	Local Authorities
LCA	Life Cycle Assessment
OCS	Organic Content Standard
OEF	Organization Environmental Footprint
PEF	Product Environmental Footprint
PEFCR	Product environmental Footprint Category Rules
SDG	Sustainable Development Goals
SME	Small and medium-sized enterprise
VET	Vocational Education and Training



## 1. EXECUTIVE SUMMARY

Our global economy demands an urgent shift to sustainability, driven by increasing consumer pressure for green products. For this reason, it is essential that we all have the same and true understanding of sustainable production and that we combat misinformation.

VETting Green's objective is to facilitate transparency and a common and true understanding of sustainable practices and concepts through the creation of an online platform. This understanding will avoid intentional or unintentional greenwashing by companies in the footwear, apparel and related sectors.

The main objective of WP3 is to give visibility to already existing policies and contribute with a policy brief to the creation of new ones that could allow public bodies, policy makers and relevant stakeholders to promote a successful transition and sustainable strategic growth of their communities to become climate neutral by 2050 and, at the same time, to promote the active engagement of all the actors involved on the production processes on the footwear sector in a wide spectrum against practices not respecting current policies and affecting the image of the industry.

From this main objective the following specific objectives are developed:

- To tackle greenwashing thanks to the networking between producers, policy makers and consumers that could promote cooperation in the footwear and apparel sector.
- To promote networking and synergies between the private and public sector related with actions to more sustainable productions on the footwear and apparel industry, including cooperation with education bodies that could incorporate those topics on Vocational Education and Training (VET) formal systems.
- To contribute to the promotion of greener policies (especially on the footwear sector) that could facilitate a democratic process and structured bottom-up dialogue between Local Authorities (LAs) and Civil Society Organizations (CSOs).
- To fight against the misinformation related with green footwear productions and misconceptions on the environmental footprints related to it.
- To give visibility to European Union (EU) efforts and policies to protect and promote states sustainable growth to promote citizens belonging and strengthen their European identity.
- To implement the EU guidance and involve citizens in any effort intended to achieve the Green Transition which couldn't be possible without citizens' support.

This initial research report is a starting point for the study and research on legislation regarding greenwashing, including the identification of successful cases on green claims communication.

**Published in December 2024, this document reflects current legislation. Nevertheless, due to the fast-evolving nature of sustainability legislation, we recommend checking the European Commission's website for any updates or alterations to the information provided.**

To evaluate industry preparedness for the greenwashing challenge, we conducted a comprehensive survey titled "Is Your Company Ready to Fight Greenwashing?" This survey reached 74 companies across Portugal (39%), Spain (20%), Italy (20%), and beyond through targeted campaigns on LinkedIn, email, and other platforms. The insights gleaned from this



research, detailed in Chapter 8, were instrumental in shaping the core curriculum of our upcoming training course designed specifically for businesses.

Most respondents (88%), as expected, are small businesses (micro and SME) operating in the footwear industry cluster (65%). Half of the companies have a designated employee responsible for social and environmental issues, however in many cases these employees assume other responsibilities; and about 51% of companies adhere to sustainability standards or related regulations. ISO 14001 - Environmental management certification is the most adopted among these companies (36%). Only 43% of companies use certified materials or produce certified products. The results highlight a significant lack of awareness regarding sustainable legislation. Over half of the companies surveyed (53%) are unfamiliar with the Corporate Sustainability Reporting Directive (CSRD), while 43% are unaware of the proposed legislation and 53% are not familiar with the Product Environmental Footprint (PEF) initiative. However, 62% of the companies indicate that they make sustainability claims. Beyond awareness, it's crucial to prepare companies for compliance with relevant regulations.

A significant majority of companies (73%) perceive greenwashing as a pertinent matter and recognize the necessity of training initiatives.

The survey results highlighted a strong demand for comprehensive training on sustainability and greenwashing prevention. The results indicate that the following topics should be covered by the training platform

- Understanding greenwashing: A comprehension of the concept, including successful cases examples to distinguish between genuine sustainable practices and misleading claims.
- Navigating sustainability legislation: Knowledge of relevant directives and regulations to ensure compliance and avoid legal consequences.
- Certification processes: Understanding different certification types, their significance, and how to obtain them.
- Deep dive into product sustainability: Expertise in assessing product environmental impact through LCA studies, developing eco-design strategies, and setting clear reduction goals.
- Effective communication: Skills to convey sustainability messages clearly and convincingly to target audiences.



## 2. INTRODUCTION

The European Commission (EC) started its path to sustainability in 2015 with the adoption of the first circular economy action plan. It included 54 measures to promote Europe's transition towards a circular economy, improve global competitiveness, foster sustainable economic growth, and generate new jobs.<sup>1</sup>

In 2019 and 2020 European Commission actively pursued its objectives by adopting the European Green Deal and New circular Economy Action Plan, respectively. These initiatives aim to boost Europe toward a carbon-neutral, environmentally sustainable, toxic-free, fully circular economy, and an efficient use of resources by the year 2050. Over the past years, several regulations and directive proposals are being launched, discussed, and adopted, addressing a spectrum of critical issues, including, among other, waste management, eco design, microplastics, deforestation, sustainability report, Environmental, Social and Governance (ESG), circular economy and green claims.<sup>1</sup>

In general, the industry, including footwear and apparel clusters, is aware of and committed to sustainability and contributing to carbon neutrality. Industry is investing, taking, and implementing measures to create more sustainable businesses, services, manufacturing processes and products. The implementation of ecodesign strategies, traceability, digital product passport, the ethics and cooperation between stakeholders are some of the initiatives that need to work in synergy to get more sustainable footwear and apparel products and businesses.

However, sustainability is also being used as a marketing tool, used by companies as a means of differentiation of the market. In the past years, we have witnessed a growing and "aggressive" marketing by brands and products claiming to be sustainable, using attributes such as recycled products, biobased products, biodegradable products, and organic or vegan products, ethical, among others. However, it is also usual finding that many of these environmental claims have no technical or scientific background and are often communicated to the consumer in an unclear and unsubstantiated way. As a result, the testing, evaluation, and certification of materials is more and more important to sustain the brands and products' claims, promoting as well transparent communication and informed choice by consumers, hence counteracting Greenwashing.

A study conducted in 2020 by the EC found that a considerable share of environmental claims (53.3%) provides vague, misleading, or unfounded information about products' environmental characteristics across the EU and across a wide range of product categories. This study also indicates that 40% of claims were unsubstantiated.<sup>2</sup> To combat greenwashing, we can highlight the adoption of proposals on green claims<sup>2</sup>. The EC is also working to empower consumers for the green transition through better protection against unfair practices and better information<sup>3</sup>.

To prepare the footwear and apparel industry, it is fundamental to develop practices that could provide sector staff, students, and trainers new skills, related with this field, answering to the real needs of the labour market, contributing to the employment of more qualified professionals.



### 3. EUROPEAN SUSTAINABLE POLICIES

There are several EU policies and initiatives related with sustainability with impact in footwear and apparel products. Under these policies the footwear is included in the textile ecosystem.

This chapter summarises the most relevant policies including communications, European strategies and plans, directives and regulations, as well as proposals of directives and regulations and recommendations that are being discussed at European level.

#### COMMUNICATIONS

- **COM (2019) 640 final: Green Deal**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee and the committee of the regions – The European Green Deal.
- **COM (2020) 98 final: Circular Action Plan**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions - A new Circular Economy Action Plan.
- **COM (2020) 380 final: EU Biodiversity Strategy for 2030.**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions - EU Biodiversity Strategy for 2030: Bringing nature back into our lives.
- **COM (2021) 82 final: EU Strategy on Adaptation to Climate Change**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions - Forging a climate-resilient Europe - the new EU Strategy on Adaptation to Climate Change.
- **COM (2021) 350 final: New Industrial strategy**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions - Updating the 2020 New Industrial Strategy: Building a stronger Single Market for Europe's recovery.
- **COM (2021) 550 final: Fit for 55**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions – 'Fit for 55': delivering the EU's 2030 Climate Target on the way to climate neutrality.
- **COM (2022) 141 final: Sustainable and Circular Textiles**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions EU Strategy for Sustainable and Circular Textiles.
- **COM (2022) 682 final: Plastics**  
Communication from the commission to the European Parliament, the Council, the European economic and social committee, and the committee of the regions - EU policy framework on biobased, biodegradable and compostable plastics.



- **COM (2023) 62 final: Green Deal Industrial Plan**  
Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions - A Green Deal Industrial Plan for the Net-Zero Age.
- **COM (2024) 63 final: Europe's 2040 climate target**  
Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions - Europe's 2040 climate target and path to climate neutrality by 2050 building a sustainable, just and prosperous society.
- **COM (2024) 91 final: Managing climate risks**  
Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions - Managing climate risks - protecting people and prosperity.

## RECOMMENDATIONS

- **(EU) 2021/2279 – PEF and OEF**  
Commission Recommendation (EU) 2021/2279 of 15 December 2021 on the use of the Environmental Footprint methods to measure and communicate the life cycle environmental performance of products (PEF) and organizations (OEF).

PEF is a method based on a Life Cycle Analysis (LCA) and a set of specific rules to calculate the environmental performance of products belonging to a product category in scope, such as apparel and footwear products, considering the entire product life cycle (from the extraction and pre-processing of raw materials, manufacturing, distribution and use of the product to end of life).



Figure 1 – Product life cycle.



PEF studies aim to improve the validity, comparability, and verification of the environmental performance of products, support reliable and relevant environmental claims and contribute to the single market for green products.<sup>4</sup>

The implementation of a PEF/LCA involves a large amount of data that need to be supplied by the companies about the apparel and footwear product under study, including data on:

1. Raw materials and pre-processing: Origin, composition, processing processes and quantity of footwear and apparel materials and components necessary to produce the final product.
2. Manufacturing: Consumptions and emissions associated with footwear and apparel manufacturing process (e.g., energy and water consumption and emissions).
3. Distribution: Transport and storage of final products.
4. Use: Consumptions and emissions over the product lifetime (e.g., energy, maintenance materials, water), including durability & repairability.
5. End of Life: Activities that occur after the footwear or apparel is no longer used and is disposed of or recycled.

PEF studies calculate 16 impact categories related with ecosystems, human health, natural resources, climate change and water, using a software tool where primary and secondary data are uploaded, following Product Environmental Footprint Category Rules (PEFCR) and implementing calculation methods defined for each impact category.<sup>4</sup>

The absolute values of each impact category are normalised and weighted, allowing the identification of the most relevant impact categories, life cycle stages, processes and flows that should intervene to reduce the environmental impact of footwear products.

The final document of Footwear PEFCR should be released at the end of 2024.<sup>5</sup>

SPECIFIC RULES	COMPARABILITY	COST OPTIMISATION	ECO-DESIGN	COMMON FRAMEWORK
<p>Defines specific rules tailored to 13 apparel &amp; footwear categories such as t-shirts, dresses, boots, swimwear, etc.</p>	<p>Increases the consistency and comparability of the environmental impact of two items</p>	<p>Reduces cost, time and improves accessibility for SMR by having one standardised set of calculation rules with pre-defined, validated assumptions</p>	<p>Informs and encourages eco-design approaches by focusing innovation efforts on identified areas of improvement, and by including durability and repairability metrics.</p>	<p>Ultimately ensures all brands follow a common framework to calculate environmental impacts and share the same understanding of results.</p>

Figure 2 – Benefits for the industry (based on<sup>5</sup>).



## DIRECTIVES

- **Corporate Sustainability Reporting Directive (CSRD) (EU) 2022/2464<sup>6</sup>**

Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.

"This new directive modernises and strengthens the rules concerning the social and environmental information that companies have to report. A broader set of large companies, as well as listed SME, will now be required to report on sustainability.

The new rules will ensure that investors and other stakeholders have access to the information they need to assess the impact of companies on people and the environment and for investors to assess financial risks and opportunities arising from climate change and other sustainability issues. Finally, reporting costs will be reduced for companies over the medium to long term by harmonising the information to be provided.

The first companies will have to apply the new rules for the first time in the 2024 financial year, for reports published in 2025."<sup>7</sup>

- **Sustainability reporting standards – Delegated regulation (EU) 2023/2772<sup>8</sup>**

Commission delegated regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.

"The objective of European Sustainability Reporting Standards (ESRS) is to specify the sustainability information that an undertaking shall disclose in accordance with Directive 2013/34/EU of the European Parliament and of the Council, as amended by Directive (EU) 2022/2464 of the European Parliament and of the Council. Reporting in accordance with ESRS does not exempt undertakings from other obligations laid down in Union law."

- **Empowering consumers for the green transition through better protection against unfair practices and through better information (EU) 2024/825<sup>9</sup>**

Amends Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information. This directive entered into force on 26 March 2024.

This directive requires traders to provide clear, relevant, and reliable information on the sustainability of the product aiming, among other things, to tackle:

- misleading environmental claims ("greenwashing").
- misleading information about the social characteristics of products or traders' businesses, or non-transparent and non-credible sustainability labels.
- commercial practices that mislead consumers and prevent them from making sustainable consumption choices, such as practices associated with the early obsolescence of goods.



- **Corporate sustainability due diligence (EU) 2024/1760<sup>10</sup>**

Directive of the European Parliament and of the Council of 13 June 2024 on corporate sustainability Due Diligence and amending Directive (EU) 2019/1937 and Regulation (EU) 2023/2859.

“The directive adopted introduces obligations for large companies regarding adverse impacts of their activities on human rights and environmental protection. It also lays down the liabilities linked to these obligations. The rules concern not only the companies’ operations, but also the activities of their subsidiaries, and those of their business partners along the companies’ chain of activities.

The directive will affect companies of more than 1 000 employees with a turnover of more than €450 million, and their activities ranging from the upstream production of goods or the provision of services, to the downstream distribution, transport, or storage of products. Companies affected by the legislation adopted today will have to take and implement a risk-based system to monitor, prevent or remedy human rights or environmental damages identified by the directive.

The directive requires companies to ensure that human rights and environmental obligations are respected along their chain of activities. If a violation of these obligations is identified, companies will have to take the appropriate measures to prevent, mitigate, bring to an end or minimise the adverse impacts arising from their own operations, those of their subsidiaries and those of their business partners in their chain of activities. Companies can be held liable for the damage caused and will have to provide full compensation.

Companies affected by the directive will also have to adopt and put into effect a climate transition plan in line with the Paris agreement on climate change.

After being signed by the President of the European Parliament and the President of the Council, the directive will be published in the Official Journal of the European Union and will enter into force on the twentieth day following its publication.

Member states will have two years to implement the regulations and administrative procedures to comply with this legal text.”<sup>11</sup>

- **Rules promoting repair of goods (EU) 2024/1799<sup>12</sup>**

Directive (EU) 2024/1799 of the European parliament and of the council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828.

“This Directive lays down common rules strengthening the provisions related with the repair of goods, with a view to contributing to the proper functioning of the internal market, while providing for a high level of consumer and environmental protection.”



## REGULATIONS

- **Deforestation and forest degradation (EU) 2023/1115<sup>13</sup>**

Regulation (EU) 2023/1115 of the European parliament and of the council of 31 May 2023 on the making available on the Union market and the export from the Union of certain commodities and products associated with deforestation and forest degradation and repealing Regulation (EU) No 995/2010.

“Under the EU Deforestation Regulation, only products that are legal in the country of production and not linked to deforestation and forest degradation after 31 December 2020 can be placed on the EU market.

Smallholders producing cattle, cocoa, coffee, palm oil, rubber, soya and wood for the EU market should produce on deforestation-free land and follow national laws.

Smallholders who do not place these products on the EU market themselves are under no direct legal obligations. However, they might be asked by their business partners, for example buyers, to provide information on their production, especially on the land of production. Business partners need this information to fulfil their own obligations under the regulation.”<sup>14</sup>

- **REACH, polymer microparticles (EU) 2023/2055<sup>15</sup>**

Regulation (EU) 2023/2055 of 25 September 2023 amending Annex XVII to Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as regards synthetic polymer microparticles.

“Commission Regulation (EU) 2023/2055 restricting synthetic polymer microparticles on their own or intentionally added to mixtures – better known as “the microplastics restriction” – starts applying on 17 October 2023.”<sup>16</sup>

- **Ecodesign requirements for sustainable products (EU) 2024/1781<sup>17</sup>**

The Ecodesign for Sustainable Products Regulation (ESPR), which entered into force on 18 July 2024, replaced the current Ecodesign Directive (2009/125/EC), introducing more Ecodesign criteria for a broader range of products. It aims to make sustainable products the norm on the EU market.<sup>18</sup>

“This Regulation establishes a framework for the setting of ecodesign requirements that products have to comply with to be placed on the market or put into service, with the aim of improving the environmental sustainability of products in order to make sustainable products the norm and to reduce the overall carbon footprint and environmental footprint of products over their life cycle, and of ensuring the free movement of sustainable products within the internal market.

This Regulation also establishes a digital product passport, provides for the setting of mandatory green public procurement requirements and creates a framework to prevent unsold consumer products from being destroyed.”<sup>19</sup>



## PROPOSALS FOR DIRECTIVES

- **COM (2023) 166 Final: Green Claims**<sup>20</sup>

Proposal for a Directive of the European Parliament and of the Council on substantiation and communication of explicit environmental claims (Green Claims Directive).

"In March 2023, the Commission adopted a proposal for a Directive on Green Claims. The proposal complements and further operationalises the proposal for a Directive on empowering consumers in the green transition.

To ensure consumers receive reliable, comparable, and verifiable environmental information on products, the proposal includes:

- clear criteria on how companies should prove their environmental claims and labels;
- requirements for these claims and labels to be checked by an independent and accredited verifier; and
- new rules on governance of environmental labelling schemes to ensure they are solid, transparent, and reliable.

The proposal targets explicit claims that:

- are made on a voluntary basis by businesses towards consumers,
- cover the environmental impacts, aspects or performance of a product or the trader itself,
- are not currently covered by other EU rules"<sup>21</sup>

"On 19 September 2023, the European Parliament and Council reached a provisional agreement on new rules governing environmental claims. This follows the European Commission's proposal for a Directive (the Green Claims Directive) which was published in March 2023. Specifically, the Directive aims to prevent companies making unclear or unsubstantiated environmental claims (so-called "greenwashing") and using labels that are not credible. The end goal is to enable consumers to make sustainable choices."<sup>22</sup>

"On 12 March 2024 the European Parliament approved a proposed directive on green claims (the Green Claims Directive) during the first reading. Green claims refer to the use of statements creating an impression that a product or the activity of a trader is less damaging to the environment, including the climate. These statements may cover environmental impacts in general or may be related with specific releases to parts of the environment, such as air, water, soil or underground."<sup>23</sup>

- **COM (2023) 420 final: Waste**<sup>24</sup>

Proposal for a Directive of the European Parliament and of the Council amending Directive 2008/98/EC on waste.

"The Commission is proposing to introduce mandatory and harmonised Extended Producer Responsibility (EPR) schemes for textiles in all EU Member States. EPR schemes have been successful in improving the management of waste from several products, such as packaging, batteries and electric and electronic equipment. Producers will cover the costs of management of textile waste, which will also give them incentives to reduce waste and increase the circularity of textile products – designing better products from the start. How much producers will pay to the EPR scheme will be adjusted based on the environmental performance of textiles, a principle known as 'eco-modulation'."<sup>25</sup>

"The European Parliament adopted its first-reading position on 13 March 2024, with 514 votes in favour, 20 against and 91 abstentions."<sup>26</sup>



“MEPs have voted to strengthen a proposed extended producer responsibility (EPR) scheme for textile waste as part of a revision of the European Union’s (EU) Waste Framework Directive.

The European Parliament agreed the EPR scheme, through which companies which sell textile products in the EU would be responsible for their end-of-life, would be introduced 18 months after the revised directive comes into effect, compared to the 30 months originally proposed.”<sup>27</sup>

## PROPOSALS FOR REGULATION

- **COM (2022) 453 final: Forced labour**<sup>28</sup>

Proposal for a Regulation of the European parliament and of the council on prohibiting products made with forced labour on the Union market.

On 26 January 2024, “the Council adopted its position (negotiating mandate) on the regulation prohibiting products made with forced labour on the EU market. The negotiating mandate of the Council supports the overall objective of combating forced labour, and it introduces several improvements to the proposed text.

The Council mandate clarifies the scope of the regulation by including products offered for distance sales, envisages the creation of a forced labour single portal, and reinforces the role of the Commission in investigating and proving the use of forced labour, while aligning the proposed measures with both international standards and EU legislation.

The proposal prohibits products made with forced labour (as defined by the International Labour Organization) from being placed or made available on the Union market or exported from the Union to third countries. The competent authorities should assess forced labour risks based on a range of different sources of information, such as submissions from civil society, a database on forced labour risk areas or products, as well as information on whether the companies concerned carry out their due diligence obligations in relation to forced labour.

In the event of reasonable indications that a product has been made with forced labour, the authorities should start an investigation. This can include requests for information from companies or carrying out checks and inspections either in the EU or in third countries. If the competent authorities find out that forced labour was used, they will order the withdrawal of the product in question and ban both its placement on the market and its export. Companies will be required to dispose of the goods concerned, and the customs authorities will oversee the enforcement of the prohibition on exports or imports of banned products at the EU borders.

SME are not exempted from the regulation, but the size and economic resources of companies, as well as the scale of forced labour, should be taken into consideration before initiating formal investigations. The proposal also provides for specific support tools to help SME with the application of the regulation.

The proposal foresees the creation of a Union Network against Forced Labour Products, which will coordinate the measures taken by the competent authorities and the Commission.”<sup>29</sup>



- **COM (2023) 645 final: Reduce microplastics pollution**<sup>30</sup>

Proposal for a Regulation of the European parliament and the council on preventing plastic pellet losses to reduce microplastic pollution.

"Regarding 'unintentionally released microplastics', beyond plastic pellets, the Commission has examined several other main sources of unintentional release, such as [...] synthetic textiles [...] The preliminary analysis of the other sources revealed uncertainties and data gaps and concluded that other policy instruments may be better suited to tackle them. More information and additional analysis are needed in order to define the most appropriate interventions. For these sources, separate impact assessments may be prepared, where appropriate and necessary, to support possible proposals to tackle microplastic emissions from these sources".<sup>31</sup>



## 4. GREENWASHING

Nowadays, it is very common to find products on the market that claim to be “more sustainable”, “ecofriendly”, “bio”, “environmentally friendly”, “carbon neutral”, “biodegradable”, among others. However, most of the time, these attributes are not supported by any or little evidence and substantiation or recognized certification schemes. This can result in greenwashing i.e., the dissemination of false or misleading information, making confusion and mistrust among consumers. To overcome this limitation/problem the European Commission published a proposal for a directive on Green Claims addressing greenwashing by tackling false environmental claims made toward consumers and stopping the proliferation of environmental labels. This directive shall ensure that green claims are reliable, comparable, and verifiable.

### 4.1. REQUIREMENTS ON SUBSTANTIATION OF ENVIRONMENTAL CLAIMS

A green/environmental claim<sup>3</sup> is defined as any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names, in the context of a commercial communication, which states or implies that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time.

The **Policy Hub Circularity for apparel and footwear** identified some critical concerns about the substantiating green claims, that seems to be relevant and to be considered, namely<sup>32</sup>:

- **Need for a common method**, aiming and allowing the comparability of environmental performance and claims. Product Environmental Footprint (PEF) a common method to evaluate the environmental performance can be a unique approach to harmonise and standardise and support the green claims.
- **Simplify and harmonise the verification process**, avoiding excessive resources consumption by companies and constraints on sustainability assessment and claims.
- **Call for an Equal Level-Playing field**, avoiding the diverging standards across the EU, definition of clear requirements for the use of LCA and clear definition for verifiable methods to substantiate the green claims.
- **Policy coherence between EU legislation**, ensuring no conflict or duplication between substantiating green claims requirements and other legislation.
- **Support circular innovation**, the diversity of claims can lead to increased costs due to the need of a third-party verification, slowing down innovation. Therefore, to overcome this, an emphasis on verifying the process rather than individual complaints is suggested.
- **Extended timeline for implementation**, to implement business, labels and certification schemes.



## 4.2 IDENTIFICATION OF GREENWASHING PRACTICES<sup>2</sup>

- Displaying a sustainability label which is not based on a certification scheme or not established by public authorities or verified by third parties.
- Making a generic environmental claim for which the trader is not able to demonstrate recognised excellent environmental performance relevant to the claim: “eco-friendly”, “green”, “natural” or “more sustainable” without evidence and verifiable data or certifications to support those claims.
- Making an environmental claim about the entire product when it concerns only a certain aspect of the product.
- Presenting requirements imposed by law on all products in the relevant product category on the Union market as a distinctive feature of the trader’s offer.
- Improve and communicate an environmental impact while neglecting other relevant impacts.
- Lack of transparency in communicating the environmental impact of a product/service, company’s practices and/or production process to support informed consumer decisions.
- Create and communicate a company image related with sustainability without implementing concrete actions.

## 4.3. MECHANISMS TO AVOID/COMBAT GREENWASHING

- Define and implement the company’s sustainable policy and communicate internally and externally, considering the entire value chain.
- Transparent, clear, and trustworthy communication.
- Use recognized, credible and verifiable labels.
- ESG reporting.
- Use of due diligence as a tool to identify risks and foster business conduct that respects human rights, children’s rights, and the environment.
- Calculation of PEF (PEF/PEFCR methodology), Product Carbon Footprint (ISO 14067) or other recognized LCA methodology or standard verified by independent third parties.
- Raise awareness among consumers about sustainable practices and consumption.
- Engagements and training company workers for sustainable culture and practices.



## 5. GOOD PRACTICES

<b>Company / Brand</b>	CARITÉ CALÇADOS LDA
<b>Website</b>	www.carite.pt/pt
<b>Country</b>	Portugal

### Summary report / description identified good practices

CARITÉ CALÇADOS LDA, Portuguese footwear company, prepared and published its first Sustainability report in 2022. In a brief way, this report includes:

- Presentation and description of the company.
- Sustainability: policy, SDG, materiality
- Environmental responsibility: Management of production process, laboratory, waste management; water and effluents; GHG emissions; energy consumption; raw-material consumption; R&D projects.

The report is available online: [www.carite.pt/Files/relat-sustent-carite-vfinal.pdf](http://www.carite.pt/Files/relat-sustent-carite-vfinal.pdf)

### Pictures

**Relatório de Sustentabilidade 2022**

**Reconhecimentos**

**Política de Sustentabilidade**

**Emissões de gases de efeito estufa**

1	133
2	150
3	1480



<b>Company / Brand</b>	Anonymous Copenhagen
<b>Website</b>	<a href="http://www.anoncph.com">www.anoncph.com</a>
<b>Country</b>	Company with production in Portugal

#### Summary report / description identified good practices

Anonymous Copenhagen, a Danish footwear brand that produces its models in Portugal, obtained B Corp Certification, with the technical support of Portuguese Footwear Technological Centre (CTCP).

To get the B Corp Certification organizations are evaluated on several criteria, including global management, ethics, transparency, environmental sustainability, internal (focused on employees) and external (contribution to the community) social responsibility and relationships with partners (suppliers and customers).

#### Pictures





<b>Project</b>	Bioshoes4All project: Green Pact
<b>Website</b>	<a href="http://compromissoverde.apiccaps.pt">compromissoverde.apiccaps.pt</a>
<b>Country</b>	Portugal

### Summary report / description identified good practices

The Portuguese Footwear Association (APICCAPS) and Portuguese Footwear Technological Centre has launched a new initiative, the Shoes Green Pact, in which the country's footwear manufacturers have been asked to sign on to 10 commitments, including energy efficiency, product design and packaging, and would be audited independently. More than 140 companies, representing a business value close to EUR 800 million per year, have already accepted to join this initiative launched in February 2023.

The goal of the Portuguese Shoes Green Pact is to inspire and support footwear companies and the entire value chain to prioritize a circular economy and reduce the environmental impact of the sector and mobilize companies in the footwear cluster to commit and work towards the goals set by the United Nations and Europe, namely, achieving net-zero carbon emissions in 2050 and halving carbon emissions in 2030.

This initiative is in line with the ambition of the Portuguese cluster of footwear and leather goods of becoming an "international benchmark and strengthening its exports, combining virtuously sophistication and creativity with productive efficiency, based on the technological development and management of the international value chain, thus ensuring the future of a national production basis, sustainable, and highly competitive".

### Pictures





<b>Project</b>	Life Green Shoes4All
<b>Website</b>	<a href="http://www.lifegreenshoes4all.eu">www.lifegreenshoes4all.eu</a>
<b>Country</b>	Portugal / Spain / Belgium / Romania /Italy

**Summary report / description identified good practices**

Life GreenShoes4All aimed to implement, demonstrate and disseminate:

- Product Environmental Footprint (PEF) studies for footwear products from different categories, contributing to the definition of a set of recommendations and lessons learned for the footwear industry, as well as the identification of product life cycle hotspots that can be intervened to reduce the environmental impact of footwear products.
- New recycling approaches to produce thermoplastic and thermoset recycled materials and footwear components based on manufacturing wastes, reducing the consumption of resources, landfill waste and greenhouse gas (GHG) emissions.
- Green shoes with lower Environmental Footprint, by implementing PEF studies, eco-design strategies and using new recycled materials.
- New sustainable & customer driven production and consumption.

The implementation of LIFE GreenShoes4All approaches intended to contribute to reducing the CO<sub>2</sub> and other greenhouse gases emissions within the footwear sector, reinforcing the objectives of EU's Environment, Climate and Energy Frameworks.

Life GreenSheos4All main outcomes include:

- Methods to measure and reduce materials, soles, and shoe products' environmental footprint between 10 % and 30 % based on the European Product Environmental Footprint methodology.
- Practical eco-design guidelines for shoe design, manufacturing, distribution, use phase and end-of-life.
- New recycling routes to obtain high-quality recycled thermoplastics, EVA, and vulcanised rubber incorporating between 60 % to 100 % of discarded material thus reducing the raw material consumption and the deposition of waste in landfills.
- Innovative sustainable fashion and safety green shoes based on new design approaches, recycled materials, and manufacturing methodologies

**Pictures** (Materials developed in the project)



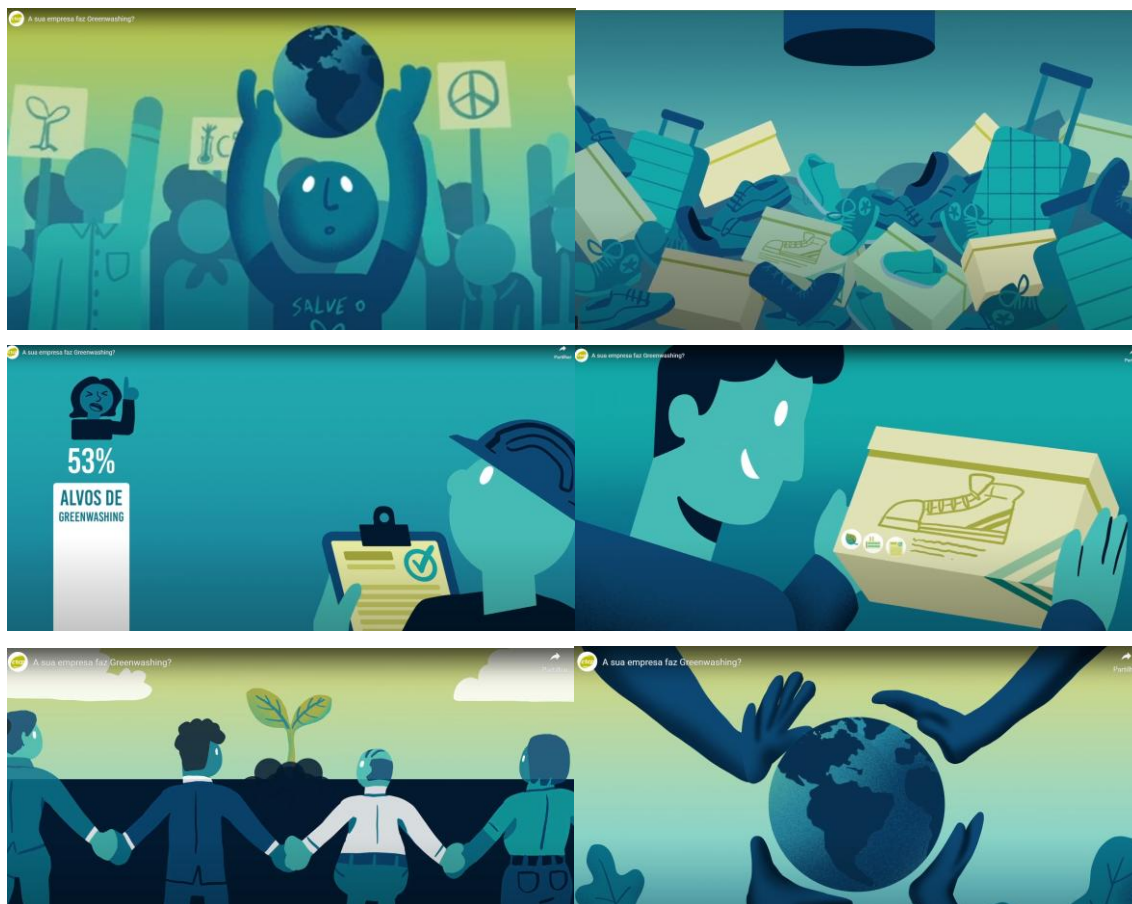


<b>Project</b>	ShoeDigiNov
<b>Website</b>	<a href="https://www.youtube.com/watch?v=OtCL9u8OrjY">https://www.youtube.com/watch?v=OtCL9u8OrjY</a>
<b>Country</b>	Portugal

**Summary report / description identified good practices**

Video: Does your company do Greenwashing?

**Pictures** (Images of the video)





<b>Company / Brand</b>	Ecoalf
<b>Website</b>	<a href="https://ecoalf.com/en">https://ecoalf.com/en</a>
<b>Country</b>	Spain

#### **Summary report / description identified good practices**

Ecoalf was born in 2009 with a vision to stop carelessly using natural resources. The mission was to create the first generation of recycled products with the same quality and design as the best non-recycled products on the market. In 2014 together with SIGNUS and CTCR (Footwear Technology Centre of La Rioja), ECOALF's first collection of innovative flip-flops were born. This award-winning project uses 100% recycled tyres and does not require any kind of glue thanks to its innovative technology.

The Ecoalf Foundation was born to support the most revolutionary project: 'Upcycling the Oceans'. The project is a worldwide adventure created with the support of the fishing industry to help remove and recover marine waste that is destroying the oceans and close the loop by transforming it into top quality yarn and fabrics to produce high-quality products. The goal of the company is sustainable innovation to minimise the use of natural resources.

It started by innovating in materials, both in their origin and in the way they are manufactured, and it has been gradually innovated in eco-design, processes, technological tools that help to measure and improve the impact. Since 2009, ECOALF has developed more than 400 recycled and/or low-impact fabrics including recycled polyester. The brand works with polyester from different sources such as plastic bottles recovered from the bottom of the ocean, which, an innovative process, becomes the Ocean Yarn.

ECOALF has worked tirelessly for the past 12 years to develop high-quality recycled cotton as a substitute for conventional cotton. From 2014 until now, the use of recycled cotton in its fashion collection has grown from 30 to 100%. Recycled cotton comes from post-industrial and post-consumer waste and is recycled through a mechanical process.

Other sustainable materials include recycled wool and cashmere, post-consumer coffee grounds, recycled tyres, linen, recycled nylon, microplastic limiting nylon and artificial cellulosic fibres.

ECOALF is a B CORP certified corporation since 2018 and the Most Environmentally Responsible Company in Spain in 2022(Merco Ranking)

The company shows its sustainability report clearly and transparently on its website. The report has been prepared in accordance with the requirements established by the Global Reporting Initiative (GRI) standards and is externally verified every year by TUV SUD.

The report is available online:

[https://cdn.shopify.com/s/files/1/0553/2804/7279/files/ECOALF\\_Sustainability\\_Report\\_2022\\_271123.pdf?v=1701084859](https://cdn.shopify.com/s/files/1/0553/2804/7279/files/ECOALF_Sustainability_Report_2022_271123.pdf?v=1701084859)



## Pictures

### UPCYCLING THE OCEANS

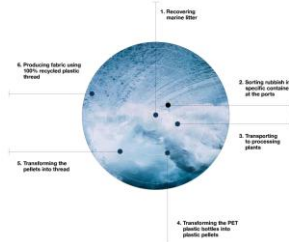
This revolutionary project seeks to look after the oceans and strengthen the circular economy, transforming marine litter into top-quality thread for our garments.

Upcycling the Oceans was implemented in Spain in 2015 as a pilot project, with 9 fishing ports involved. One year later, ECOALF led the project to extend its activity all along the Spanish coast and to ensure the proper management of the waste recovered.

Since then, it has also been implemented in Thailand, Greece, Italy and France.

Because the recovered waste has been exposed to sunlight, salt and water, treatment in R&D is essential in order to transform it into high-quality thread that meets ECOALF standards.

Upcycling the Oceans also provides the science community with information to foster knowledge about the issue of marine litter and in order to establish preventative measures. The voluntary participation of part of a fishing fleet has made it possible to identify the waste found on the sea bed using the Marmora platform.



#### PROJECT RESULTS GLOBALLY

<b>69</b> ports	<b>366.68 tn.</b> rubbish recovered from the seabed (+90% vs. 2021)
<b>1,082</b> boats	<b>1,041 tn.</b> rubbish recovered from the seabed (since 2015)
<b>4,234</b> fishermen	



ECOALF FROM UTOPIA TO ACTION



### OUR FIGURES

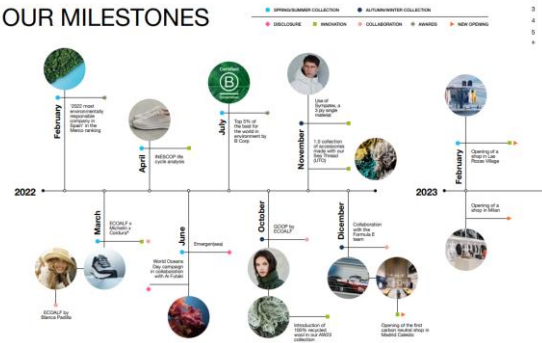
PURPOSE	<b>42%</b> women in the Management Committee	<b>0</b> breaches of the ethics standards	<b>3</b> Ethics and Values Committee meetings
	<b>100%</b> of the Management Committee has received training on ECOALF anti-corruption policies and procedures	<b>99/200</b> score in B Corp (+21% vs. 2021)	<b>100%</b> transactions with product suppliers* who meet the Conduct Code <small>* For the suppliers that represent 80% of turnover</small>
PRODUCT	<b>60</b> countries where our products reach (+61% vs. 2021)	<b>+1,800</b> points of sale (+42% vs. 2021)	<b>3.3 tn.</b> of plastic recycled for La Roca Village
	<b>40</b> countries square in department stores (33 national / 7 international)	<b>€ 46 M</b> turnover (+25% vs. 2021)	<b>917,573</b> product units sold (+11% vs. 2021)

ECOALF FROM UTOPIA TO ACTION

PEOPLE	<b>197</b> people on staff (+24% vs. 2021) <small>152 women / 45 men</small>	<b>€ 43 M</b> payments to suppliers (+60% vs. 2021)	<b>3,078</b> total hours of volunteering <small>890 hours from ECOALF staff</small>
	<b>1,026</b> people participating in volunteering organized by the ECOALF Foundation	<b>321.1 M</b> press views	<b>59,817 €</b> donated to the ECOALF Foundation for the 'BECAUSE THERE IS NO PLANET B' campaign
PLANET	<b>3</b> carbon neutral shops	<b>8.9 tn.</b> waste collected in "Clean Rivers, Clean Oceans" (ERDF) (+61% vs. 2021)	<b>+1,195 tn.</b> CO <sub>2</sub> eq. prevented with our 2022 Spring/Summer collection
	<b>366.68 tn.</b> rubbish recovered from the bottom of the sea from the Upcycling the Oceans (UO) project (+95% vs. 2021)	<b>+12,260 M</b> litres of water equivalent saved with our 2022 Autumn/Winter collection** <small>** Compared to the industry standard</small>	

ECOALF FROM UTOPIA TO ACTION

### OUR MILESTONES



ECOALF FROM UTOPIA TO ACTION





<b>Company / Brand /Project</b>	<b>GEOX</b>
<b>Website</b>	<b><a href="http://www.geox.biz/en/sustainability/innovation-sust.html">www.geox.biz/en/sustainability/innovation-sust.html</a></b>
<b>Country</b>	<b>ITALY</b>

#### **Summary report / description identified good practices**

Years ago, GEOX began taking the path of Sustainable Innovation, which concerns all areas of the business. The company has adopted the best solutions available to minimise its energy consumption including:

- 100% of the electricity that GEOX uses in Italy, Austria, France, Switzerland and Germany comes from renewable sources. Worldwide, the share of green electricity is 83% (it was 74% in 2020).
- The GEOX logistics centre in Signoressa (Treviso, Italy) is equipped with two photovoltaic plants, completed in 2010 and 2020, which independently produce enough energy to meet 44% of its needs - an amount comparable to the annual consumption of 630 homes.
- The factories composing GEOX's supply chain take part in an audit program carried out by an independent international company, which conducts a test protocol to verify compliance with local laws and our code of conduct in terms of three main areas: Environmental impact, social impact and Safety.
- Starting from 2021 GEOX consolidated the use of components with sustainable characteristics in the construction of footwear and materials with recycled components.

GEOX adopted for the first time in 2005 a Code of Ethics and a Code of Conduct which govern the relationships with all the employees and suppliers. The Code of Conduct is based on three main pillars : the Human Capital (the code explicitly mandates the ban of underage employment, forced labour and any form of employees discriminations; it guarantees the freedom of association and the right to join Trade Unions and regulates the allowed disciplinary procedures; it directs the payment of minimum wages as defined by law or by collective bargaining agreements and the respect of the legal limits permitted by the local law of the maximum working hours including overtime; finally, it requires the definition of specific health and safety management plan, fire and other natural disasters contingency plans, first aid and physical working environment safety measures). Second, the Environmental Protection (it ensures the compliance to all the local regulations concerning chemicals and hazardous substances, waste management, water and air emission management). Finally, the Supply Chain Transparency and Regulatory Compliance (it regulates the potential involvement of sub-contractors, anti-corruption practices and the participation in an independent auditing plan).

To guarantee the respect of Geox values, the code of conduct is signed by all the factories and the tanneries with which we have a continuous relationship.



<b>Company / Brand</b>	Siemens Gamesa
<b>Website</b>	Committed to Sustainability   Siemens Gamesa
<b>Country</b>	Spain - Germany

#### Summary report / description identified good practices

Siemens Gamesa aim to empower employees to make a change in their lives by helping them to be part of the solution to climate change. They launched a communication strategy to involve as many users as possible.

In addition, Siemens Gamesa achieved carbon neutrality in late 2019 and has its climate targets verified by the Science Based Target Initiative (SBTi). However, they want to go further. They are going beyond carbon neutrality and aim to become climate positive by 2040, meaning that by this stage we will be removing more CO<sub>2</sub> from the atmosphere than we emit. They will achieve this through a combination of actions such as microalgae that absorb CO<sub>2</sub> from the atmosphere to hydrogen-powered reach stackers, or the commitment to phasing out the greenhouse gas SF<sub>6</sub> and other F-gases by 2030.

They encourage these positive changes across the value chain, which is why they have developed a comprehensive framework integrating their supplier's sustainability performance into our supplier selection and development processes.

Moreover, the Recyclable Blade (2021) is the first step towards their goal of delivering a fully recyclable turbine by 2040, ensuring that all materials in the turbine can be recycled.

In line with the United Nations' Sustainable Development Goals, their Social Commitment department is focused on combating poverty, protecting the environment, and promoting technological education in the regions they are operating, towards a better Planet and to ensure that communities are equipped with the skills they need for a digital future. Over the last three years, their 3000+ volunteers have supported more than three million people in 57 countries.

#### Pictures





<b>Company / Brand</b>	<b>Reale Seguros (Reale Group)</b>
<b>Website</b>	Divulgación de información en materia de sostenibilidad (reale.es)
<b>Country</b>	Spain

**Summary report / description identified good practices**

The Reale Group's Sustainable Investment Policy is committed to integrating and evaluating Environmental, Social and Governance (hereinafter ESG) factors in investment management, in order to integrate financial analysis with Environmental, Social and Governance information.

In this way, the scope of traditional financial analysis is extended by integrating ESG factors in the selection of investments with the aim of improving long-term profitability, mitigating ESG risks and identifying investment opportunities created or supported by the transition towards the progressive application of ESG selection criteria.

Sustainability is an integral and fundamental part of the definition of the Reale Group's Remuneration Policies, which are based on solid, fair and transparent remuneration mechanisms.

The Group's Sustainability Strategy has integrated a system of ESG metrics in remuneration based on the correlation of part of the variable remuneration with the achievement of ESG and Sustainability objectives. In the 2021 evaluations, individual objectives began to be evaluated with a new distribution of weights, placing greater emphasis on the objectives of meeting the expectations of certain categories of stakeholders (internal and external), as well as the achievement of strategic objectives, with a social or environmental impact, as well as those linked to innovation and transformation...

Adverse Incidents are the negative impact that investment decisions can have on ESG sustainability factors, which is why the Reale Group carries out the following actions in order to mitigate them:

- Policies for identifying and describing the main adverse effects.
- Codes of conduct and sustainability strategy. The Reale Group recognises the important role of internationally shared principles and standards that can reinforce its approach as a sustainable and responsible investor: It supports UN's SDG, since 2017, it has been a member of the UN Global Compact, an initiative created to encourage companies worldwide to adopt sustainable policies and make public the results of the actions undertaken and in 2023, the Group has signed up to the Principles for Sustainable Insurance (PSI). A global framework for the insurance industry to address ESG risks and opportunities.



## 6. ECO-LABELLING

The Ecolabel Index<sup>33</sup> identifies the existence of 456 ecolabels in 199 countries and 25 industry sectors. In 2020 European Commission identified about 230 sustainable labels in use in the Europe<sup>34</sup>. Table shows examples of some of the identified labels.

Table 1 – Sustainable ecolabels.<sup>34</sup>

Logo	Description
	<p><u>Better Cotton Initiative</u></p> <p>The Better Cotton Initiative (BCI) promotes a comprehensive set of production principles and criteria for growing cotton in a more sustainable manner: socially, environmentally and economically. A member-based organisation made up of players from the entire cotton supply chain. BCI currently has a system in place to trace Better Cotton from the farm to the gin. The organisation's goal is to catalyse the mass market production of cotton produced more sustainably, by creating demand on a global scale for a new mainstream commodity, Better Cotton. BCI is complementary to other initiatives like Certified Organic, Fairtrade cotton and Cotton made in Africa (CmiA).</p>
	<p><u>B Corporation</u></p> <p>B Corporations are a new type of corporation which uses the power of business to solve social and environmental problems. B Corporations are unlike traditional responsible businesses because they meet comprehensive and transparent social and environmental performance standards, institutionalize stakeholder interests, and build collective voice through the power of a unifying brand. B Corporations' transparent and comprehensive performance standards enable consumers to support businesses that align with their values, investors to drive capital to higher impact investments, and governments and multinational corporations to implement sustainable procurement policies.</p>
	<p><u>Carbon Reduction Label</u></p> <p>The Carbon Reduction Label is a public commitment that the carbon footprint of a product or service has been measured and certified and the owner of the product or service has committed to reduce that footprint over the following two years. The footprint that has been calculated will have been rigorously measured and be comparable based on the PAS2050 standard and Footprint Expert™. This will have a been full life cycle assessment including production, use and disposal. The certification must be undertaken again after two years and prove that real reductions have been made.</p>
	<p><u>Global Organic Textile Standard</u></p> <p>The Global Organic Textile Standard (GOTS) was developed with the aim to unify the various existing standards and draft standards in the field of eco textile processing and to define world-wide recognized requirements that ensure organic status of textiles, from harvesting of the raw materials, through environmentally and socially responsible manufacturing up to labelling in order to provide a credible assurance to the end consumer. Processors and manufacturers shall be enabled to supply their organic fabrics and garments with one certification accepted in all mayor selling markets.</p>



	<p><u>Compostability Mark of European Bioplastics</u></p> <p>Enables compostable products to be identified by a unique mark and channelled for recovery of their constituent materials in specially developed processes.</p> <p>The Compostability Mark thus conveys product information to waste-disposal plant operators and product image to consumers.</p>
	<p><u>Cradle to Cradle Certified (CM) Products Program</u></p> <p>The Cradle to Cradle Certified (CM) Products Program provides a company with a means to demonstrate efforts in eco-intelligent design. Cradle to Cradle Certification is a third-party sustainability label that requires achievement across multiple attributes: use materials that are safe for human health and the environment through all use phases; product and system design for material reutilization, such as recycling or composting; use of renewable energy; efficient use of water, and maximum water quality associated with production; company strategies for social responsibility. Cradle to Cradle Certified CM is a certification mark sublicensed by the Cradle-to-Cradle Products Innovation Institute.</p>
	<p><u>Global Recycle Standard</u></p> <p>The Global Recycled Standard is intended for companies that are making and/or selling products with recycled content. The standard applies to the full supply chain and addresses traceability, environmental principles, social requirements, and labelling. Developed with the textile industry in mind, the GRS may also be applied to products from any industry.</p>
	<p><u>EMAS: European Eco-Management and Audit Scheme</u></p> <p>Recognises and rewards those organisations that go beyond minimum legal compliance and continuously improve their environmental performance.</p>
	<p><u>EU Ecolabel</u></p> <p>A voluntary scheme designed to encourage businesses to market products and services that are kinder to the environment and for European consumers - including public and private purchasers - to easily identify them.</p>
	<p><u>Fair Trade Organization mark</u></p> <p>Fairtrade is an ethical trade system that puts people first. Fairtrade offers farmers and workers in developing countries a better deal, and the opportunity to improve their lives and invest in their future. Fairtrade gives consumers the opportunity to help reduce poverty and instigate change through everyday shopping.</p> <p>When a product carries the FAIRTRADE Certification Mark, it means the producers and traders have met Fairtrade Standards. Fairtrade Standards include social, environmental and economic criteria, as well progress requirements and terms of trade. The Standards are designed to support the sustainable development of small-scale producers and agricultural workers in the poorest countries in the world.</p>



  	<p><u>Organic Content Standard</u></p> <p>The Organic Content Standard (OCS) is an international, voluntary standard that provides chain of custody verification for materials that originate from a farm certified to recognised national organic standards. The standard is used to verify organically grown raw materials from the farm to the final product.</p> <p>bluesign® is your partner for success in the ever-evolving global market for sustainability solutions. Our experts independently verify environmental claims of your products and business against the bluesign® CRITERIA allowing you to carry our label. Our holistic approach assesses the entire textile value chain with a focus on sustainable chemistry.</p>
	<p><u>OEKO-TEX Standards</u></p> <p>The mission is to create trust within the textile and leather industry and among for its customers. Products bearing the OEKO-TEX® STANDARD 100 and OEKO-TEX® LEATHER STANDARD labels have been scientifically tested for the presence of harmful substance Products bearing the OEKO-TEX® STANDARD 100 and OEKO-TEX® LEATHER STANDARD labels have been scientifically tested for the presence of harmful substances and are a better and safer choice for your health. Textiles and leather carrying the OEKO-TEX® MADE IN GREEN label are produced more sustainably in socially responsible workplaces.</p> <p>The OEKO-TEX® STeP certification and the DETOX TO ZERO analysis set the highest standards for social and environmental aspects of textile and leather production. Chemicals and treatments that meet the OEKO-TEX® ECO PASSPORT standard have been tested and analysed against strict criteria, for a lower environmental impact. OEKO-TEX® RESPONSIBLE BUSINESS helps you to prevent or mitigate existing and potential negative impacts of business operations within your own activities, your supply chains and your further business relationships. OEKO-TEX® ORGANIC COTTON certification provides verification from farm to product. Products bearing this label have been tested for the use of genetically modified organisms (GMOs) and harmful substances and are a better and safer choice for your health. Textiles and leather carrying the OEKO-TEX® MADE IN GREEN label are produced more sustainably in socially responsible workplaces. The OEKO-TEX® STeP certification and the DETOX TO ZERO analysis set the highest standards for social and environmental aspects of textile and leather production. Chemicals and treatments that meet the OEKO-TEX® ECO PASSPORT standard have been tested and analysed against strict criteria, for a lower environmental impact. OEKO-TEX® RESPONSIBLE BUSINESS helps you to prevent or mitigate existing and potential negative impacts of business operations within your own activities, your supply chains and your further business relationships. OEKO-TEX® ORGANIC COTTON certification provides verification from farm to product. Products carrying this label have been tested for the use of genetically modified organisms (GMOs) and harmful substances.</p>



## 7. SURVEY

As part of the VETting Green project, a survey titled "Is your company ready to fight Greenwashing?" was developed to assess the footwear and apparel sectors' preparedness and awareness for preventing greenwashing and to identify training needs. The survey covered four key areas: company data, contact information, environmental knowledge and practices, and greenwashing knowledge. It was translated into English, Portuguese, Spanish, Italian, and Greek, and distributed online [1], through social media (e.g., Facebook, LinkedIn), and direct outreach (email and phone). We collected 74 responses, surpassing the target of 40 surveys. Although we exceeded our goal, securing a diverse range of participants proved increasingly challenging, despite concerted efforts from all partners.

This chapter presents the results and their analysis. Results are visually represented using both absolute numbers and percentages in graphical format.

### 7.1 Results

A total of **74 companies responded** to the survey "Is your company ready to fight Greenwashing?". Most respondents (39%) were based in Portugal, followed by Italy and Spain (both 20%). The remaining 21% represented a diverse group of countries including Greece, Poland, Czech Republic, Hungary, Croatia, and the USA.

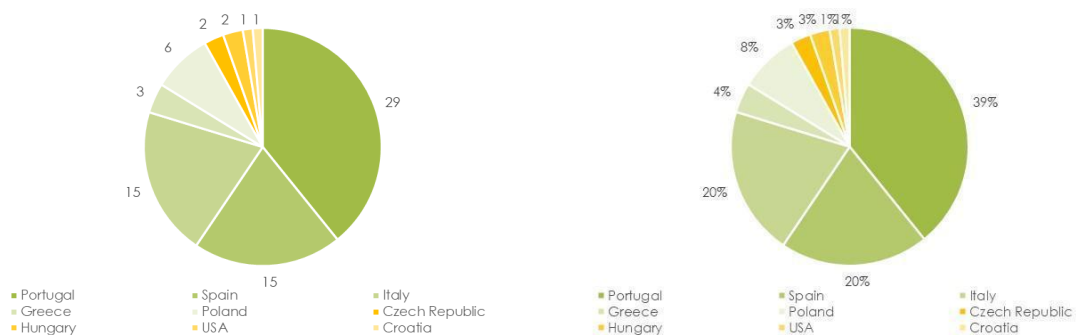


Figure 3 – Country.

**88% of the companies are micro and SME**, 47% medium, 31% small and 9% micro. The results represent European industrial companies, which are essentially made up of micro and SME.



Figure 4 – Size of company.



**65% and 15% are footwear and footwear or textile supplier companies**, respectively, 3% are textile manufacturers and 13% other related companies.



Figure 5 – Type of company.

50% of the companies have a person in charge for the company's social and environmental sustainability issues.



Figure 6 – Person in charge for the company's social and environmental sustainability issues.

49% of the companies do not comply with any standard or have any certification related with sustainability.

36% of the companies are certified by ISO 14001 – Environmental management, 7 % by SA 8000 – Social, responsibility, 9% by ISO 45000 – Occupational health and 18% have other type of certifications.



Figure 7 – Company's sustainability certification.

Regarding the product certification or the use of certified materials, **57%** of companies say they **do not use certified materials or have certified products**. 26% of the companies have or use materials with GRS certification, 1% CRS, 20% OEKO-TEX and 18% FSC. **Only**



**3% of the companies have products with EU ecolabel.** 9% have materials or products with another type of certifications.

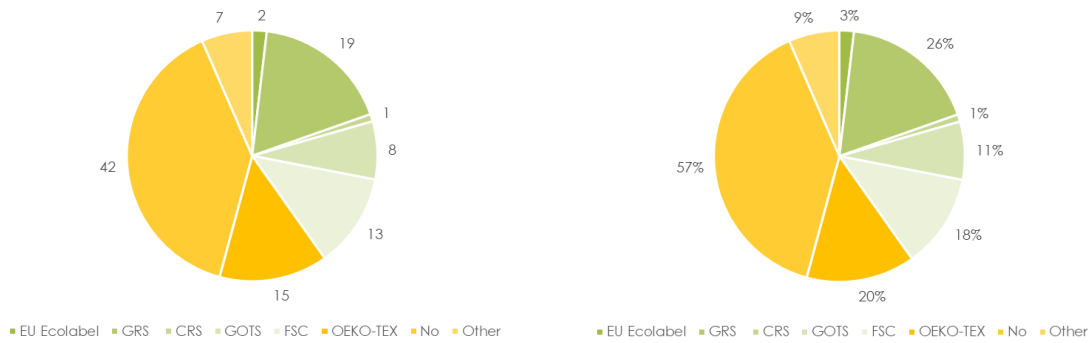


Figure 8 – Product's certification.

**47% of the surveyed companies are aware of Corporate Sustainability Reporting Directive (CSRD).** However, despite the non-obligation of SME to prepare sustainability report, this awareness needs to be improved, and measures are needed to prepare SME to answer to the challenges of sustainability reporting. Since micro and SME, are normally suppliers of large companies, which are obligated to the sustainability report, they will have to prepare and supply data to these companies to prepare their reports. Furthermore, sustainability reporting must be seen as a differentiating factor in an increasingly competitive market.

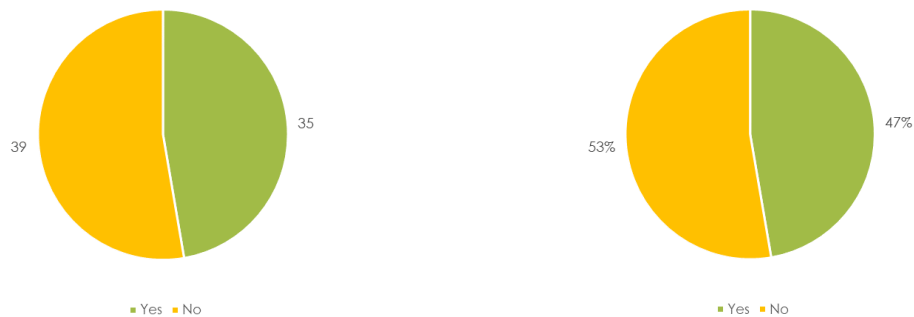


Figure 9 – Corporate Sustainability Reporting Directive awareness.

The PEF initiative aims to provide a single methodology for calculating the impacts of a product to increase comparability, robustness, and trustworthiness of the results. The PEF method is a LCA study based on international standards, such as ISO 14040 and ISO 14044, which has been completed within more specific guidelines/rules, ensuring consistent and comparable environmental performance results of products of the same category.

From the 74 surveyed companies, **53% says that are not aware of the PEF initiative.** The results indicate that work needs to be done to increase this number and elucidate about the benefits of PEF studies for textiles/apparel and footwear products.

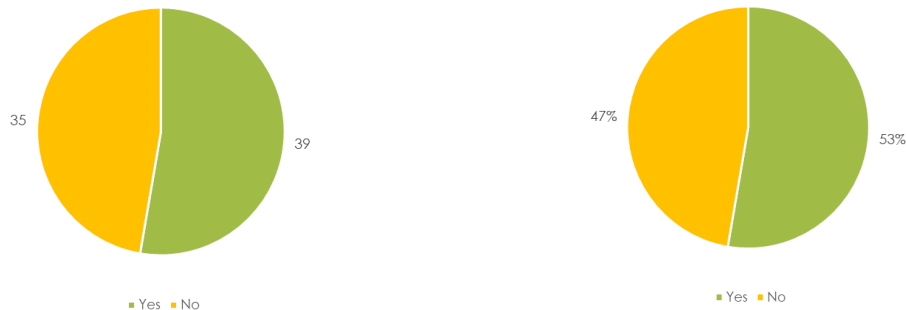


Figure 10 – PEF initiative awareness.

When it comes to legislation, 43% of companies are unaware of any of the regulations or guidelines mentioned. **Only 35% of the companies are aware of the ecodesign** for sustainable products regulation and speaking of the other diplomas the number is even lower.



Figure 11 – Legislation proposals awareness.

**62% of the companies claim to make statements related with the sustainability** of the products/company, being the claims “Sustainable/more sustainable”, “Recycled” or “Recyclable”, “Eco-friendly” and “Eco-conscious” the most used by companies. The lack of knowledge about the legislation and high percentage of companies that make sustainable claims are indicative that it is necessary to work on the training of companies avoiding non-compliance with legislation but also greenwashing. The new legislation obliges companies to make claims based on evidence and scientific support.

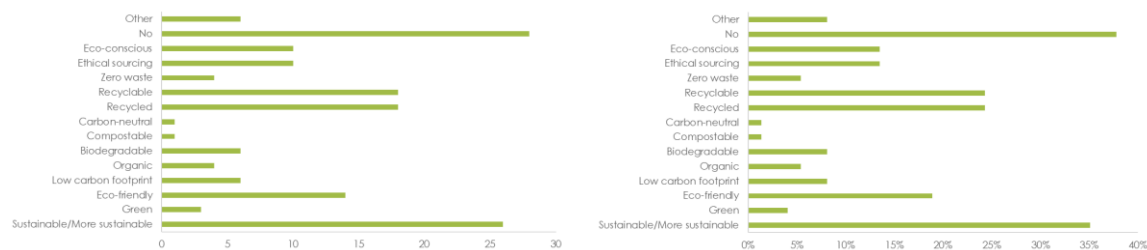


Figure 12 – Sustainability claims.

**28% of the companies do not use any ecodesign strategy** during the development of new products. Some companies apply more than one strategy; and the use of recycled materials is the strategy most used by companies.

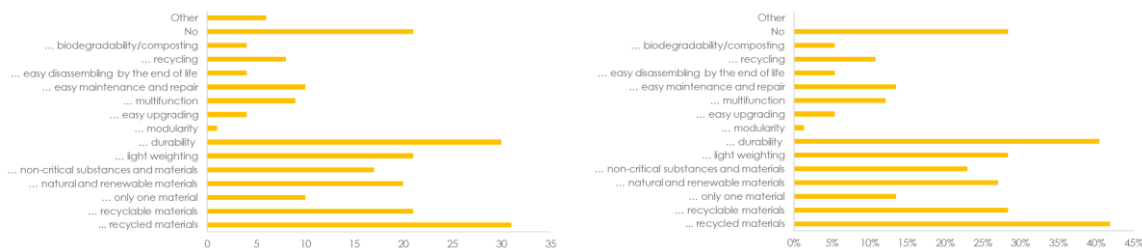


Figure 13 – Ecodesign strategies.

About strategies used to be more efficient and sustainable during the manufacturing; companies indicate the implementation of different strategies. “Waste management system” with 74%, “Implemented photovoltaic panels” and “Good practices in the use of energy” each with 66%, and “Good practices in the use of materials” with 62% are the strategies most used by companies.



Figure 14 – Strategies to be more efficient and sustainable

**73% of companies consider that greenwashing is a relevant issue** for them and 16% that is relevant, but it is not a major concern. Only 5% consider that it is not a significant issue and 5% are unsure.



Figure 15 – Relevance of greenwashing.

Regarding the **awareness** of company/employees about the concept of greenwashing, **32% and 30% are somewhat or moderately aware**, respectively, and **only 11% of the companies consider that they are quite aware**.



Figure 16 – Relevance of greenwashing.

**23%** consider that they have **no knowledge at all** and **32% and 30%**, respectively, that they have **some or moderate knowledge**.



Figure 17 – Awareness of company/employees about the greenwashing concept.

Companies indicate that “Insufficient training or education”, “Lack of clear guidelines or policies”, “Lack of awareness or understanding” and “Limited resources or support” are challenges to effectively address greenwashing.



Figure 18 – Challenges of greenwashing.

**41% of the companies consider training in greenwashing to be moderately important** and **27%** that is very important. **23%** think this is not very important, **5%** that is not important at all and **4%** are not sure.



Figure 19 – Importance of training in greenwashing.

In general, companies consider that the topics related with sustainability and greenwashing should be addressed in training courses dedicated to footwear and apparel companies.

Training courses should address topics such as the concept and practices of greenwashing, good practices, and sustainable claims, how to communicate sustainability, ecolabels, among others.

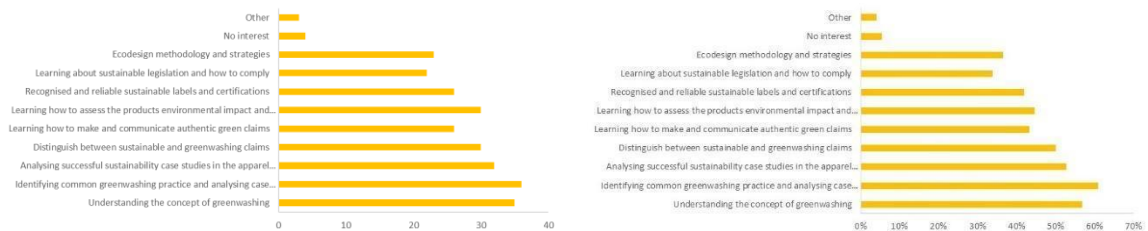


Figure 20 – Topics to be addressed in greenwashing training.



Table 2 - Comments from companies: Is your company implementing any sustainable practices?

Is your company implementing any sustainable practices? If so, please describe.
Reduction of waste in the production line, eco design, production of unique pieces to use dead stocks.
Supply of energy from renewable sources, use of non-impacting chemicals, for all other materials we are conditioned by our customers.
Portuguese Green Pact, R&D project related with ESG.
Zero waste, photovoltaic energy production, recycling.
Installation of a self-consumption production unit.
Environmental certification.
Calculation of carbon footprint and compensation of CO2 via sink
Photovoltaic panels.
Digitalization of best practices.
Saving energy (heating, water, proposing free repairs to customers).
Reuse of used boxes, energy management, supply chain mostly in EU.
We will start a journey with VCS through Assocalzaturifici.
Total waste recovery and recycling of obsolete products.
Yes: reuse of production waste such as leather, fabrics, finished products, and semi-finished products; material certifications such as FSC for paper, cardboard, and wood; LWG for leather, BCI for cotton material; we source our energy partly from photovoltaic panels; we know and track the country of origin for animal breeding and slaughter and the country of cultivation for textile plants.
Waste reduction, verification and more efficient processes
Implementation of Photovoltaic panels, increase of electric vehicles and process digitalization
Use of 100% renewable and photovoltaic system
Elimination of overproduction.
Reuse of waste and use of raw material from responsible consumption.
Zero waste.
Test of recycled and potential of biodegradable materials.
I'm not sure what you mean by the concept of sustainability. How is it measured when you do it naturally?
Related with consumption and waste
Yes. Several. Renewable energy, local sources of supply, durability of products, optimisation of materials end energy, use.
Installation of photovoltaic panels; development of products using renewable raw materials instead of fossil fuels; development of products with recycled materials; waste reduction and productivity improvement through digitalization, monitoring, and process traceability; replacement of raw materials from other continents with European alternatives; worker training and improvement of working conditions; replacement of critical chemical raw materials from the point of view of toxicity.
Nice Footwear has been voluntarily publishing its sustainability report for several years and strongly believes in the use and implementation of sustainable processes and animal-free materials. Each year, it invests resources to identify new materials, processes, and solutions with a lower environmental impact.
Practise according LWG protocol.
Just starts with ESG strategy. We use in all processes 100% green energy. Investment in CAD cutting system, automation in stitching, shoeboxes made from 100% recycled paper, using water-based glue, for packaging plastic tape switched to paper tape with starch glue.
All new developments, including those not for footwear, carry that intention in their creation.



Table 3 – Other comments from companies.

**Any other comment you would like to add related with greenwashing?**

From what I know, greenwashing is not practiced in the company.

It should be same for manufacturers and importers. Right now, we have to comply with a set of requirements, which generates costs, on the other hand China does not have to which implicates bigger price/cost difference between EU and Asia.

In my opinion, in the case of micro-enterprises, the idea of greenwashing seems to be abstract. The micro-entrepreneur doesn't have the human resources to implement all these solutions.

There is a need for clarity and subsidies, especially for small and medium-sized enterprises.

We already have practices in place to prevent the phenomenon.

There is a need for unique and clear labels, where a single certification can value the company and each product, so that the consumer really knows what they are buying, like an energy efficiency traffic light.

To eliminate greenwashing, a single official sustainability label would be necessary.

We welcome this initiative to bring order to the market. However, regarding sustainable product (green, vegan, eco, etc.) the question arises whether the certification will be for the company or the product? Additionally, how much will this certification increase the price of the product, given that current prices are already at the upper limit of affordability (especially for children's shoes)? If product certification is chosen, please be aware of the time constraints, as collections often need to reach the market quickly.

It is very good to fight against Greenwashing, it is very important for not everyone to affirm it if it is not properly supported, but even more important is that if European policies tend to force its compliance, everything that is imported into the European Union is equally obliged, and those who do not do so are persecuted, not allowing the entry of those products and companies.



## 7.2 Contributions for training design

The main key findings of the conducted survey to assess the preparedness of footwear and apparel sectors for greenwashing include:

- **Low awareness of environmental regulations:** Most companies are unaware of key environmental legislation.
- **Limited sustainability certifications:** A significant portion of companies lack any environmental or product certifications.
- **Prevalence of greenwashing claims:** Many companies make sustainability claims without sufficient evidence or scientific support.
- **Gap in ecodesign knowledge:** A considerable number of companies do not employ ecodesign strategies in product development.
- **Recognition of greenwashing as an issue:** While most companies acknowledge greenwashing as a relevant issue, awareness and understanding are still limited.

Based on the survey results, the following training areas are essential for the footwear and apparel sectors:

- **Greenwashing prevention:** Understanding the concept, implications, and avoidance strategies.
- **Environmental legislation:** Knowledge of relevant legislation.
- **Ecodesign:** Training on sustainable product development strategies.
- **Sustainability communication:** Effective and true communication of sustainability practices.
- **Ecolabels and certifications:** Understanding and proper use of ecolabels and certifications.

The footwear and apparel sector faces significant challenges in terms of sustainability and greenwashing. Targeted training programs can help companies improve environmental practices, prevent greenwashing, and enhance competitiveness.



## 8. CONCLUSIONS

The European Commission has undertaken a comprehensive approach to sustainability, with a particular focus on achieving carbon neutrality by 2050. By publishing a wide range of strategic plans and legislation, the Commission has provided a clear framework for businesses and society to transition towards more sustainable practices.

Surveys conducted among footwear and apparel sector (collected 74 surveys) reveal that companies have started their journey towards sustainability, with some companies with a step forward, as expected. However, there is still a noticeable lack of knowledge regarding environmental legislation. Additionally, misleading environmental claims remain unclear for many companies. It is therefore essential to provide companies and their employees with the necessary training to prevent greenwashing practices and ensure compliance with environmental regulations.

The results of surveys identified key training needs for sustainability within apparel and footwear industry. These practices aim to prevent greenwashing; understanding sustainable legislation and its business implications; comprehend the importance and how to implement ecodesign in product development; and effectively communicating sustainability through credible and transparent ecolabels and certifications.



## 9. GLOSSARY

**Biobased material**<sup>35</sup>: Biobased material consists mainly of a substance, or substances, derived from living matter (biomass), which may be obtained from nature or synthesized.

**Biodegradable material**<sup>36,37</sup>: Materials that biodegrade under anaerobic conditions degrades by the action of microorganisms in the absence of oxygen, leading to the formation of carbon dioxide, methane, and biomass, whereas a biodegradable material under aerobic conditions degrades by the action of microorganisms in the presence of oxygen, giving rise to the formation of carbon dioxide, water, mineral salts and other elements present in the material, as well as biomass.

**Certification scheme**<sup>3</sup>: Third-party verification scheme that certifies that a product, process or business complies with certain requirements, that allows for the use of a corresponding sustainability label, and the terms of which, including its requirements, are publicly available and meet the following criteria: (i) the scheme is open under transparent, fair, and non-discriminatory terms to all traders willing and able to comply with the scheme's requirements; (ii) the scheme's requirements are developed by the scheme owner in consultation with relevant experts and stakeholders; (iii) the scheme sets out procedures for dealing with non-compliance with the scheme's requirements and provides for the withdrawal or suspension of the use of the sustainability label by the trader in case of non-compliance with the scheme's requirements; and (IV) the monitoring of a trader's compliance with the scheme's requirements is subject to an objective procedure and is carried out by a third party whose competence and independence from both the scheme owner and the trader are based on international, Union or national standards and procedures.

**Compostable material**<sup>38,39</sup>: Compostable material is a type of material that is biodegradable under aerobic composting conditions at a rate comparable to other compostable materials, leaving no distinguishable visible or toxic residues.

**Communication**<sup>38</sup>: The European Commission issues a wide variety of communications. Communications may include policy evaluations, commentary or explanations of action-programmes or brief outlines on future policies or arrangements concerning details of current policy. Policy proposals will never be put forward by means of a communication.

**Directive**<sup>40</sup>: This legally binding act of the European Union establishes a set of objectives which all member states of the European Union must fulfil. The member states are required to implement directives. The member states are free to choose the manner they see fit to fulfil the required objectives.

**Environmental claim**<sup>3</sup> - Any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names, in the context of a commercial communication, which states or implies that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time.

**Explicit environmental claim**<sup>2</sup> - An environmental claim that is in textual form or contained in a sustainability label.

**Generic environmental claim**<sup>3</sup> - Any explicit environmental claim, not contained in a sustainability label, where the specification of the claim is not provided in clear and prominent terms on the same medium.



**Greenwashing**<sup>39</sup>: Greenwashing refers to the practice of falsely promoting an organization's environmental efforts or spending more resources to promote the organization as green than are spent to actually engage in environmentally sound practices. Thus, greenwashing is the dissemination of false or deceptive information regarding an organization's environmental strategies, goals, motivations, and actions.

**Regulation**<sup>40</sup> - This legally binding act of the European Union is directly applicable in all member states of the European Union. The regulation is similar to national legislation in terms of the impact and direct effect it generates. As such the regulation is the most pervasive of all the legal instruments of the EU.

**Life cycle assessment (LCA)**<sup>40,41</sup>: Compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product system throughout its life cycle.

**Sustainability label**<sup>3</sup>: Any voluntary trust mark, quality mark or equivalent, either public or private, that aims to set apart and promote a product, a process or a business with reference to its environmental or social aspects or both. This does not cover any mandatory label required in accordance with Union or national law.

**Sustainability information tool**<sup>3</sup>: Software, including a website, part of a website or an application, operated by or on behalf of a trader, which provides information to consumers about environmental or social aspects of products, or which compares products on those aspects.



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