May 2025

ATAG
AIR TRANSPORT ACTION GROUP

SUSTAINABILITY COMMUNICATIONS GUIDEBOOK

NAVIGATING ENVIRONMENTAL CLAIMS RESPONSIBLY

CONTENTS

FOREWORD

BY HALDANE DODD,
EXECUTIVE DIRECTOR ATAG

Across the globe, governments and regulatory bodies are intensifying their scrutiny of environmental claims to protect consumers from being misled and prevent greenwashing. While evolving regulations in this context may seem onerous, and perhaps they are to some extent, they also improve legal certainty and present an opportunity for us as an industry to strengthen trust, credibility, and accountability in how we communicate our environmental and sustainability efforts. Given that air transport accounts for 2-3% of global carbon emissions–along with additional non-CO_2 impacts–and maintains a high public profile, the sector must be extra careful when using environmental claims.

Recent actions taken against companies within the aviation sector on this matter serve as an important reminder that how we communicate our sustainability efforts matters just as much as the actions themselves. Transparency and accuracy are crucial–not just to maintain credibility, but to ensure that passengers, investors, and regulators have a clear and truthful understanding of the industry's progress and challenges.

The downside of these legal challenges is that some companies may decide to stop communicating on climate and sustainability action and, even worse, decide it is too troublesome to undertake climate projects at all. So-called *green hushing* is a real danger. We should not be afraid to communicate our actions. But we do need to ensure that any communications are transparent, accurate and can stand up to scrutiny.

In my view, a competitive spirit within the industry around emissions reduction can be positive, as innovation and ambition drive meaningful change. Marketing against competitors on climate action, however, risks undermining the collective effort needed to tackle aviation's environmental impact. Sustainability should not be used as a tool to differentiate individual companies; rather, it should be seen as a shared responsibility–much like safety and security–where the entire industry benefits from a common mission to reach our 2050 goal of net zero carbon emissions.

By communicating responsibly and focusing on collective climate action, we can foster trust and demonstrate our genuine commitment to sustainability.

These guidelines are to help spur discussion in your business about the best way to communicate about our sector's sustainability plans. They are not legal advice, but based on experiences from others in the sector. We have a good story to tell on our climate plans, but we need to ensure that message is not ambiguous or subject to misinterpretation by consumers. A balance between vision, clarity, transparency and honesty should form the basis for aviation's sustainability messaging.

1. NAVIGATING ENVIRONMENTAL CLAIMS RESPONSIBLY

Environmental claims, or so-called *green claims,* are increasingly being used by organisations across all industries in their corporate and commercial communications. This also applies to the global air transport sector as it advances towards its 2050 goal of net zero carbon emissions and responds to passenger and customer expectations for environmental action. However, the use of environmental claims carries the risk of greenwashing if claims are vague, ambiguous, or unsubstantiated. The European Commission states that climate-related claims are particularly prone to being unclear and ambiguous and to mislead consumers[1]. In addition, between 60% and 75% of people surveyed in Australia, Canada, New Zealand, and the United States feel poorly or not at all informed about requirements companies must follow to use green claims, which is consistent with results in European countries (69%)[2]. Recent cases of greenwashing have undermined confidence in sustainable business practices, products and services even if the actions behind them are genuinely rooted in climate action[3].

It is therefore unsurprising that more action is being taken by governments across the globe to regulate the use of environmental claims. Some examples include:

In 2023, **Australia** published updated guidelines, and its national consumer and competition authority announced that 'concerns in relation to environmental claims and sustainability' are key enforcement priorities in 2025[4].

Following recent changes to the Competition Act, **Canada** is currently developing enforcement guidelines regarding environmental claims to 'ensure clarity and transparency'[5].

In October 2024, **India** issued a new guideline that prohibits companies from engaging in 'misleading environmental claims and greenwashing'[9].

In 2023, the **UK's** advertising authority published an updated version of its guidance on 'misleading environmental claims and social responsibility'[10].

In February 2024, the **European Union** adopted new rules regarding the use of environmental claims in commercial communications and the legislative process for adopting the Green Claims Directive is in progress, which aims to establish standards and new requirements for companies[6]. The RefuelEU Aviation directive also lays down uniform criteria for a consumer-facing labelling scheme to view and compare the estimated greenhouse gas emissions of their flight. This scheme, which is voluntary in nature, is intended to enable consumers to compare the environmental impact of commercial flights of different airline operators[7].

Several EU countries including **Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, Italy, the Netherlands, Poland, Spain, and Sweden** previously issued guidance or amendments to their consumer protection and competition regulations to set standards for environmental claims[8].

1. https://www.europarl.europa.eu/doceo/document/A-9-2024-0056_EN.html
2. https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-149_The_Great_Green_Maze_How_environmental_advertising_confuses_consumers.pdf
3. https://www.twobirds.com/en/insights/2024/singapore/green-claims-and-greenwashing-a-legal-update
4. https://www.twobirds.com/en/trending-topics/green-claims/australia
5. https://competition-bureau.canada.ca/how-we-foster-competition/education-and-outreach/environmental-claims-and-greenwashing
6. https://environment.ec.europa.eu/topics/circular-economy/green-claims_en
7. https://transport.ec.europa.eu/news-events/news/eu-introduces-flight-emissions-label-more-informed-and-sustainable-travelling-2024-12-18_en
8. https://www.twobirds.com/en/trending-topics/green-claims
9. https://pib.gov.in/PressReleasePage.aspx?PRID=2064963
10. https://www.morganlewis.com/pubs/2024/03/forging-a-united-front-uk-regulators-take-steps-to-combat-greenwashing

In parallel to the development of a more restrictive regulatory landscape, consumer protection organisations and NGOs have been more active as well. For example, the European Consumer Organisation (BEUC) recently launched a coordinated enforcement action against 17 European airlines for allegedly misleading consumers. This action is following an increasing number of cases in recent years, where missteps in environmental messaging led to accusations of greenwashing by regulators, damaging brand reputation and undermining the public's trust in the genuine progress of the net zero transition. This development is not unique to the aviation industry and impacts businesses across all industries and sectors.

It is important to note that most guidelines and rulings on greenwashing apply to business-to-consumer (B2C) communications only with the main objective of protecting the consumer from being misled. Businesses marketing to other businesses are less likely to face scrutiny. However, this guidebook aims to provide uniform best practices and recommendations for sustainability communications that can be equally applied to B2C and business-to-business (B2B) communications. It serves as a practical guide for the air transport sector on how to communicate with care to:

- Ensure clarity, accuracy, and substantiation of environmental claims
- Strengthen public confidence in the aviation industry's sustainability commitments
- Avoid misleading statements that could expose organisations to reputational risks and accusations of greenwashing

Please note that this guidebook does not offer legal advice but instead provides some high-level thoughts and guidance on how to communicate environmental (and, particularly, climate-related) actions responsibly, foster greater transparency, build trust with passengers and stakeholders, and harmonise environmental communications practices within the industry's net-zero transition. It will hopefully help companies in the aviation sector think constructively about climate communications but should not be seen as a replacement for seeking your own legal advice on communications and marketing exercises based on local regulatory conditions - these will evolve over time as well.

1.1. SCOPE OF THE GUIDEBOOK

This guidebook applies to all environmental and sustainability-related communications within the civil aviation industry, covering public and media relations, sustainability disclosures, marketing materials, advertisements, promotional campaigns, as well as statements made on websites, social media, and other digital platforms.

1.2. DEFINITIONS

To ensure clarity, the list below defines the key terms that frequently arise in environmental communications. These terms should not be understood as appropriate terms merely by their inclusion in the list, definitions are provided instead to clarify guidance provided in subsequent chapters.

- **Net-zero emissions:** Net zero emissions are achieved when anthropogenic emissions of greenhouse gases to the atmosphere are balanced by anthropogenic removals over a specified period. Net-zero can refer specifically to net-zero greenhouse gas emissions, which may relate solely to the so-called *Kyoto gases*–carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF_6), and nitrogen trifluoride (NF_3)–or to a broader set of emissions. This highlights the importance of precise and transparent communication when discussing net-zero targets.
- **Net-zero carbon emissions:** Net zero carbon dioxide (CO_2) emissions are achieved when anthropogenic CO_2 emissions are balanced globally by anthropogenic CO_2 removals over a specified period. Net zero CO_2 emissions are also referred to as carbon neutrality[11]. In 2021, the global aviation industry adopted the goal to reach net-zero carbon emissions by 2050.
- **Claim:** Any visual or written communication such as statements, information, labels, slogans, brand names, company names, collections, filters, symbols, pictograms, company strategies, certificates, or any other form of communication used for promoting sales[12].
- **Environmental or green claims:** Environmental or green claims are claims which suggest that a product, service, process, brand, or business is better for the environment. They include claims that suggest or create the impression that a product or a service has a positive environmental impact or no impact on the environment, is less damaging to the environment than a previous version of the same good or service, or is less damaging to the environment than competing goods or services[13]. Environmental claims may concern the impact on the environment in general or on specific environmental aspects such as the air, water, or soil. Environmental claims can be explicit or implicit. They can appear in advertisements, marketing material, branding (including business and trading names), on packaging, or in other information provided to consumers.

---

11. https://www.ipcc.ch/sr15/chapter/glossary/
12. https://www.acm.nl/system/files/documents/guidelines-sustainability-claims.pdf
13. https://assets.publishing.service.gov.uk/media/61482fd4e90e070433f6c3ea/Guidance_for_businesses_on_making_environmental_claims_.pdf

- **Greenwashing:** The practice of giving a false impression of the environmental impact of a product or activity, which can mislead consumers[14].
- **Green hushing:** The practice where companies deliberately downplay, withhold, or avoid communicating their environmental or climate-related actions and goals – not because they aren't doing anything, but because they fear backlash, scrutiny, or accusations of greenwashing. In other words, companies may choose silence over transparency, even when they are making genuine progress, to avoid reputational or legal risk. This can result in reduced public trust and a lack of shared learning across industries.
- **Lifecycle:** The consecutive and interlinked stages of a product's life, consisting of raw material acquisition or generation from natural resources, pre-processing, manufacturing, storage, distribution, installation, use, maintenance, repair, upgrading, refurbishment as well as re-use, and end-of-life[15].

2. PRINCIPLES OF ENVIRONMENTAL CLAIMS

Environmental claims are genuine when they properly describe the impact of the product or service and do not hide or misrepresent crucial information[16]. It is recommended that organisations review existing messaging and communications to ensure it is not false or deceptive, and to ensure evidence of substantiated claims can be provided, and that the communications are easily understood by the 'average consumer'. The following rules of thumb are based on a synthesis of recently published consumer protection regulations and guidelines and should be seen as a best practice for all sustainability communications.

Case Study: Commission and national consumer protection authorities take action against 20 airlines for misleading greenwashing practices[17]

In 2024, the European Commission and the EU's Consumer Protection Cooperation (CPC) network acted against 20 airlines around claims suggesting that paying additional fees for climate projects or sustainable aviation fuels (SAF) could offset flight emissions. Authorities warned that such practices could constitute misleading commercial actions under EU law.

The case highlights the increasing regulatory scrutiny of environmental claims in aviation, underscoring the need for transparent, evidence-backed communication.

The CPC argued that ads were misleading as they were:

- Claiming that SAF emits less CO_2 than kerosene in flight without clarifying that the benefits of SAF are instead on a lifecycle basis.
- Suggesting that contributions to climate projects through the purchase of carbon credits can offset or reduce the impact of flight emissions.
- Making broad 'green' or 'sustainable' claims without substantiation.
- Stating progress toward net zero emissions without verifiable commitments and independent oversight.
- Providing carbon emission calculators without transparent, science-based methodology.
- Comparing flight emissions without sufficient disclosure of the underlying data.

14. https://www.europarl.europa.eu/topics/en/article/20240111STO16722/stopping-greenwashing-how-the-eu-regulates-green-claims
15. https://environment.ec.europa.eu/topics/circular-economy/green-claims_en
16. https://assets.publishing.service.gov.uk/media/61482fd4e90e070433f6c3ea/Guidance_for_businesses_on_making_environmental_claims_.pdf
17. https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_24_2322/IP_24_2322_EN.pdf

2.1. QUICK GUIDE[18]

✓ DO

Assess all evidence to substantiate your claims and **ensure you can verify** each statement.

Ensure that environmental claims **consider the entire lifecycle** of a product unless explicitly stated otherwise.

Claims should always be **truthful and easy for consumers to understand.**

Verify that any supporting evidence is current and sourced from reliable, **scientifically proven information.**

Consider **how your audience will interpret the claim as a whole** and the overall impression it creates.

Make additional **information easily accessible** if it cannot fit within the advert or visual supporting the claim, for example via a QR code or a direct link.

Any conditions or limitations of a claim should be clearly stated alongside it.

Comparisons should always be **fair, accurate, and transparent** and must not mislead consumers or unfairly discredit competitors.

Use **precise and specific claims** instead of broad, generic statements, unless you have strong, verifiable evidence to support them.

✗ DO NOT

Avoid making claims about product features that are merely **standard or required by law.**

Do not provide **misleading or deceptive statements.**

Do not **omit or hide information** relevant to the claim.

Do not use **symbols or terms without fully understanding** their precise meaning.

Do not make claims that are only partially true.

Do not overstate or exaggerate evidence to make a claim seem more impressive than it actually is.

Do not make vague or unsubstantiated statements.

Do not compare the environmental impact of products or businesses on a like-for-like basis.

Do not make claims about future sustainability goals unless they are **backed by a clear, objective, verifiable strategy** with defined targets.

---

18. *The principles, rules of thumb, and guidance in this chapter are based on a synthesis of information from various guidelines and regulations available on environmental claims. These documents include the E.U. Directive EU 2024/825 on Empowering Consumers for the Green Transition and the proposed EU Directive on substantiation and communication of explicit environmental claims (Green Claims Directive), the Guidelines regarding Sustainability Claims version 2, 2023 of The Netherlands Authority for Consumers & Markets; the Guidance on environmental claims on goods and services issued by the Competition & Markets Authority of the United Kingdom; the Guidelines for Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024 issued by the Central Consumer Protection Authority of India as well as the Guides for the Use of Environmental Marketing Claims issued by the U.S. Federal Trade Commission.*

2.2. ENVIRONMENTAL CLAIMS SHOULD BE TRUTHFUL, FACTUALLY ACCURATE AND VERIFIED

Rule of thumb:

When using sustainability claims, base them on facts and verifiable information. Do not exaggerate.

A study by the EU Commission in 2020 found that 53% of environmental claims provide vague, misleading, or unfounded information about environmental characteristics. The analysis also found that 40% of claims were unsubstantiated[19]. At the time of writing this guidebook, the draft EU Green Claims Directive proposes fines of up to 4% of annual turnover for unverified environmental claims deemed deceptive and includes a verification mechanism, requiring third party verification to be delivered prior to the claim being used in commercial communications. It is, therefore, imperative that all claims be truthful, accurate, and verified.

Keep in mind that not just consumers, but all stakeholders, must be able to understand your claim, along with any explanations to substantiate that claim. It should not mislead consumers by giving them an inaccurate impression. Make sure the claim does not overstate or exaggerate the positive environmental impact of a product, service, or your organisation.

For example, packaging such as cups or bottles provided to passengers during flights should only carry the claim 'recyclable' if they are recyclable in their entirety, and not just parts of it. Food cannot carry the claim 'organic' unless it is made almost entirely of organic components (in the way that consumers would understand the common expectation of 'organic' products).

When making environmental claims, you should consider the total lifecycle of a product or service, or the overall activity of your organisation. This does not mean that information about the full life cycle must be included in every claim. However, individual components and the stages of the production or disposal of a product can affect the accuracy of that claim.

Similarly, claims must not omit or hide important information that consumers or other stakeholders need to make informed decisions. For example, making an environmental claim about a final product or service while omitting the negative impact on the environment caused by the sourcing of materials, the production processes, the packaging, or transportation. Ask yourself whether your stakeholders would be surprised or disappointed to hear the omitted information after they had decided to buy a product or service.

---

19. https://ec.europa.eu/commission/presscorner/detail/en/ip_23_1692

Case Study: Lloyds advert and LinkedIn post banned for making false environmental claims[20]

Both an advert and LinkedIn post by the British Lloyds Banking Group were banned in December 2024 for making false environmental claims. The ruling by the UK Advertising Standards Authority (ASA) followed an investigation into a billboard poster and three paid-for posts on LinkedIn, all of which praised the bank's climate credentials.

The LinkedIn post read: 'We're committed to supporting the energy transition, by continuing to reduce our reliance on fossil fuels and putting the weight of our finance into clean and renewable energy'.

An embedded video showed an animated electric car driving through a suburban area before descending into the countryside, passing hay bales and a forest. A final scene showed the Earth with the text 'Helping Britain Prosper', with the word 'Prosper' in green. The ASA found the post 'gave the general impression that renewable energy formed a significant proportion of Lloyds' investments and the companies it financed'.

However, that contradicted Lloyds' 2023 sustainability report, which said the amount of emissions supported by its financing was equivalent to 32.8m tonnes of carbon dioxide. The ASA said that represented 'a large contribution to GHG emissions'.

The advertising authority concluded: 'We considered that meant, despite the impression given in [the] advert, Lloyds was continuing to significantly finance businesses and industries that emitted notable levels of carbon dioxide [...] that was material information that was likely to affect consumers' understanding of the advert's overall message and so should have been made clear'.

Lloyds responded by reaffirming its commitment to environmental transparency and achieving net-zero emissions by 2050. The bank acknowledged the ASA's decision, stating that the ruling pertained to a single LinkedIn post created for a sustainability awareness day, and assured that such content would not be repeated. Lloyds emphasised that reducing the environmental impact of its business remains a fundamental part of its strategy and that it will continue to collaborate with customers, the government, and the market to reach its net-zero goals.

---

20. https://www.theguardian.com/business/2024/dec/18/lloyds-advert-banned-for-making-false-environmental-claims

Rule of thumb:

Make sure to substantiate environmental claims and regularly review all claims to keep them up to date.

Explain the magnitude of the product or service's contribution to reduced impact on the environment. When using specific claims, you must be able to corroborate the alleged sustainability benefit. Make sure that the evidence of your claim is easy to understand. It is important to make clear what part of the product or of the lifecycle the claim refers to, for example, the phase of extracting the raw materials, transport, or production. In the explanation, use concrete percentages, numbers, ranges, and avoid using unclear terms such as 'many' or 'few'. If you do not provide any additional information, or if you provide such information in an unclear or ambiguous manner, it may be perceived deceptive.

When substantiating your claim, ensure that the explanation and magnitude of the sustainability benefit are placed as near as possible to the claim itself. For example, if you post a graphic on social media highlighting an environmental claim, make sure to include a short explanation in the text of the post itself to substantiate it. Sometimes, especially for graphics or branded materials such as brochures or posters, there is little space for a further explanation of the sustainability claim. In such cases, explain clearly where the full explanation can be found. The information cannot be more than one click or activity away from the environmental claim in question. Make sure that your audience does not need to search for the claim's explanation. If there is no room for clarifying the environmental claims, it is best not to make the claim.

Make sure to keep the evidence that corroborates your claim up to date. New laws, standards, competitor products, and technological advancements may result in claims becoming irrelevant or even misleading. Changes in consumer awareness, expectations, and behaviour are also relevant as people become more conscious of the environmental impact of what they consume. This can change the information they need in order to make informed decisions. As a rule of thumb, regularly evaluate your claim and change it if necessary.

Case Study: Canada cracks down on misleading fossil fuel adverts[21]

In late 2024, Toronto and Montréal banned fossil fuel advertisements they considered misleading. The motion singled out Pathways Alliance, which represents oil producers, and Canada Action, another fossil fuel advocacy group — both of which ran advertisements in public transit stations, on buses and street cars.

The Canada Action advert claiming that 'Liquefied natural gas (LNG) will reduce global emissions' was found to have 'distorted the true meaning of statements made by professionals or scientific authorities,' and 'promised a verified result without competent and reliable evidence'. It was also stated that the ads created an 'overall misleading impression'. The advocacy groups were required to review their ads to ensure they are evidence-based, and don't amount to greenwashing.

21. https://www.cbc.ca/news/science/what-on-earth-fossil-ads-1.7347240

Rule of thumb:

Be aware of the overall impression that your claim creates through the combination of words and images.

Claims can also be misleading if what they say is factually correct or true, but the impression they give consumers about the environmental impact, cost, or benefit is deceptive. This often comes down to the visual presentation of a claim.

When phrasing any environmental claim, pay attention to the combination of words, images, and colours you use. Only use pictures of nature or similar visuals if there is a direct and verifiable link between the pictured object and the claimed sustainability benefit.

Generally, the colour green or the picture of a tree or leaf may wrongfully give the impression that a product has certain environmental benefits that cannot be substantiated. When thinking about making any sort of environmental claim you should consider the overall impact of all its components. Cherry-picking beneficial aspects and highlighting these while other aspects cause a greater or significant negative impact on the environment, can increase the risk of being accused of greenwashing.

Case Study: Airline's 'green' adverts banned[22]

In 2024, an advertising campaign by a European airline group claiming that its green initiatives were protecting the world were banned by the UK Advertising Standards Authority (ASA), which ruled the advert was misleading consumers over the environmental impact of flying.

The campaign featured an aircraft with an image of the Earth on its underside and the claim: 'Connecting the world. Protecting its future'. The advert was banned over concerns the airline was giving consumers a 'misleading impression of its environmental impact'.

The airline countered that the purpose of the poster campaign, which contained a link to its Make Change Fly environmental campaign website, was to address the need to reduce the impact of flying, saying the claims were based on aspirations, including becoming carbon neutral by 2050. However, the ASA said consumers would view the advert as a claim that the airline had already taken 'significant mitigating steps' to ensure that the net environmental impact of its business was not harmful. Many of these initiatives [are] targeted to deliver results only years or decades into the future,' the ASA said.

'We also understood that there were currently no environmental initiatives or commercially viable technologies in the aviation industry which would substantiate the absolute green claim "protecting its future", as we considered consumers would interpret it'. The ASA banned the advertising campaign, telling the airline to make clearer and better substantiated environmental claims in the future and to not give a misleading impression of the impact caused by flying.

CONNECTING THE WORLD. PROTECTING ITS FUTURE.

#MakeChangeFly   makechangefly.com

22. https://www.theguardian.com/business/2023/mar/01/airline-green-adverts-banned-uk-lufthansa-asa

Rule of thumb:

Only use symbols and icons if these support your claim and are substantiated.

The colour green or visual symbols or icons, such as a leaf icon or a globe, are casually being used in communications to emphasise the sustainable character of a product or service. They serve as quick visual cues that help consumers identify environmentally friendly choices without requiring them to process complex information - this can be very important as we want consumers to be empowered and able to make good choices. However, these symbols can also be problematic if used without clear justification. A leaf icon next to a product or service may create the impression that it is inherently sustainable, even if the claim is not backed by evidence and data.

For example, an airline places a green leaf icon next to its flight booking options, suggesting an environmentally friendly choice, without providing any further explanation. This could be misleading, as it may create the impression that the flight has no significant environmental impact.

Therefore, when using symbols or icons, keep in mind:

- Only use symbols if these support your claim.
- Make sure that your symbols and icons do not give the wrong impression of your product's characteristics.
- Only use symbols of nature such as leaves if there is a direct and verifiable link between the object and the claimed sustainability benefit

Environmental labels are also going to be regulated more strictly in the European Union in 2026. The *Empowering Consumers for the Green Transition Directive* will prohibit the use of unverified labels: Displaying a sustainability label not based on a certification scheme or established by public authorities will be considered misleading.[23]

---

23. *https://energy.ec.europa.eu/news/new-eu-rules-empower-consumers-green-transition-enter-force-2024-03-27_en*

2.3. THE LANGUAGE TO DESCRIBE ENVIRONMENTAL CLAIMS SHOULD BE CLEAR AND UNAMBIGUOUS

Rule of thumb:

Link future sustainability goals to a clear and verifiable strategy and a clear roadmap that leads to it.

Be careful not to use the overall sustainability objectives of your organisation as claims for the promotion of a product or service. However, claims about future goals can be made if they are linked to a clear and verifiable strategy to deliver them, such as 'the global aviation industry aims to achieve net zero carbon emissions by 2050.' It is necessary to base forward-looking claims on a publicly available implementation plan, ideally (or if possible) verified by a qualified third party. The plan must include measurable and time-bound targets like budgetary resources, technological developments, or the allocation of resources. In addition, in some countries such as Germany, the use of offsetting for residual emissions must be disclosed within the claim.

Case Study: Dutch advertising board finds against MSC Cruises in greenwashing complaint[24]

In October 2024, the Dutch advertising board found that sustainability claims by MSC Cruises, including that it targets 'net zero by 2050', did not meet standards.

Environmental groups, led by Fossil Free Netherlands, bringing the complaint, said claims used by the firm such as '#SavetheSea', and 'sailing to the future in a responsible way' helped tourists rationalise using a service powered by fossil fuels and contributes to global warming.

Much of the decision focused on MSC's advertising of its use of Liquefied Natural Gas (LNG) in some of its ships. LNG emits less carbon dioxide than alternatives like heavy fuel oil or marine diesel. While allowing that may be true, the advertising board said MSC had not considered LNG's broader environmental impact and it was wrong to bill it as 'one of the cleanest' fuels, saying 'such an absolutely worded claim does not fit with fossil fuels'. The advertising board said that the company's stated target of zero emissions in 2050 or 'the not all too far future' was too speculative and cannot reasonably be expected to be achieved.

24. https://www.reuters.com/business/dutch-advertising-board-finds-against-msc-cruise-greenwashing-complaint-2024-10-02/; Image right: MSC Cruises

Rule of thumb:

Use plain language and avoid generic, ambiguous, and absolute terms.

In general, claims should be worded in a transparent and straightforward way, using words that are easy to understand. Scientific or technical language should be avoided.

Use specific language to describe your claim. In sustainability communications, it may be tempting to use broad, general terms like *green, ecological, eco-friendly, or good for the planet*. However, they should be avoided as their meaning can be unclear, especially if used without explanation. Using these terms suggests that a product or service, or the organisation as a whole has a positive environmental impact. A claim may be objectively true but subjectively misleading. Generic terms may create a much more favourable impression than is justified. If you consider making these broad and absolute claims, you should consider whether they can be substantiated by clear evidence.

Terms such as conscious and responsible are also vague and ambiguous because they can be about vastly different subjects. Next to the environment, these terms can also concern economic or social conditions. They can be misleading, even when specified. When vague and ambiguous terms are used, they must be nuanced to such an extent that the claim can solely be interpreted as intended.

Some claims may only be true if certain conditions are met. In that case the conditions, qualifications, and caveats must be clear and prominent enough for consumers to see and understand them. Before making an environmental claim, you should consider whether the claim is conditional and make this clear. It is important that the claim is accurate. For example, a claim that an electric car produces zero emissions is liable to mislead consumers, but a claim that it produces zero emissions 'when driving' may not.

Case Study: Airline ads over green claims found to be "misleading"[25, 26]

Several airline adverts on Google were banned in 2024 after the UK's Advertising Standards Authority (ASA) ruled them to be misleading.

One Google advert by one airline said passengers could 'fly more sustainably' with the airline, while another said the company was 'committed to protecting the environment.' A third offered potential customers 'total peace of mind,' mentioning their environmental advocacy. All three were banned from appearing again for breaking rules on misleading advertising and environmental claims.

In each case, the ASA said the ads could not corroborate their environmental claims because the UK advert code required such absolute claims to be 'supported by a high level of substantiation'. In its ruling against Etihad, the ASA said: 'We understood that air travel produced high levels of both carbon emissions and non-carbon emissions, which were making a substantial contribution to climate change. We also understood that there were currently no initiatives or commercially viable technologies in operation within the aviation industry that would adequately substantiate absolute green claims'.

In a similar advert, one airline said it was 'one of the greenest choices in air travel', which the ASA found 'misleading as it had not made clear the basis of the claim or provided verifying information'. The ASA concluded the advert was in breach of Broadcast Advertising Code.

25. https://www.businesstravelnewseurope.com/Air-Travel/Virgin-Atlantic-Flight-100-advert-banned-over-misleading-SAF-claim
26. https://www.theguardian.com/media/2023/dec/06/air-france-lufthansa-etihad-ads-banned-misleading-claims-advertising-environmental

Tip:

If you cannot avoid using absolute terms, include the word *more* in front of the term to make the claim less certain and more accurate, for example: 'by introducing this new technology, we aim to become *more* sustainable' or '*more* carbon efficient.' By adding *more* the claim becomes comparative rather than absolute, signaling an improvement of your organisation's or product's own performance rather than a definitive state. However, note that comparative claims need to be substantiated relative to a baseline and still be as precise as possible. All principles of sustainability communications for environmental claims still apply and you can only make these claims if they are factual and substantiated and should be as specific as possible. Add data or a basis for the comparison to your claims.

2.4. COMPARISONS MUST BE FAIR AND MEANINGFUL

Rule of thumb:

When comparing your product, service, or organisation to others, ensure that the claims clearly specify which aspect is more sustainable.

Comparative claims highlight the sustainability benefits of a product or service relative to others. Make clear for which element of a product or service the comparison is made. The comparison may concern, for example, the various phases of production or the lifecycle. Make clear what you compare your product with, for example, an older model of the product, a competitor's model, or a widely accepted standard in the market. Make sure that the product or company on which you are basing your claim is a similar one that meets the same needs or same purpose.

Substantiate the comparison with up-to-date and objective facts. Clearly define the basis of any comparison such as comparing emissions reductions to older aircraft vs. industry averages. When comparing, use common standard units that consumers are familiar with and understand. For example, do not compare the carbon emissions of your product excluding transport with the carbon emissions of your competitor's product including transport.

Case Study: Airline adverts banned over 'lowest emissions' claim

An airline campaign that claimed it was Europe's 'lowest-emissions airline' was banned by the UK Advertising Standards Authority (ASA) for being misleading.

The advert did explain how the airline's more fuel-efficient aircraft, direct flight routes, and higher seat capacity meant that passengers were contributing less in terms of carbon dioxide per person. However, out of 27 European airlines, this airline scored fifth for total carbon emissions.

The ASA said consumers would interpret the advert as saying flying with the airline would mean contributing lower carbon emissions than if they had chosen a rival airline in Europe.

In its judgment, the ASA added: 'While we considered the claims in the ads would be understood relatively, and while we were satisfied that carbon emissions per passenger distance was an appropriate method to compare the carbon footprint of passengers on different airlines, we were concerned that the basis of the claims had not been made clear in the ads and that the evidence provided was insufficient to demonstrate that [the airline] was the lowest carbon-emitting airline on the basis of that metric'.

3. ENVIRONMENTAL CLAIMS IN AVIATION

This chapter provides guidance on the most common types of environmental claims used in aviation, including carbon neutrality, sustainable aviation fuels (SAF), emissions offsets, and net zero commitments. It outlines best practices to ensure these claims are substantiated and clearly communicated.

As the UN Secretary-General António Guterres put it: 'We must have zero tolerance for net zero greenwashing'. In the past, climate-related claims have been particularly prone to being unclear, ambiguous, and misleading to consumers. This relates notably to environmental claims that products or organisations are *climate neutral, carbon neutral, 100% CO₂ compensated,* or will be *net zero* by a given year. The main reason for being perceived as deceptive is that such statements are often based on offsetting greenhouse gas emissions through carbon credits. The methodologies underpinning offsets vary widely and are not always transparent, accurate, or consistent. This leads to significant risks of overestimations and double counting of avoided or reduced emissions[27]. Most importantly, greenhouse gas accounting best practice advises that emissions reduction claims should only be based on a product's actual lifecycle impact or based on emissions reductions that occurred within a company's direct operations or value chain, and not from actions that take place outside of the value chain.

To escape claims of greenwashing, any climate-related claims must be supported by science-based targets and hard data. The transition must be embedded in formal pathways that set out timelines, milestones, actions, and expected impacts, which is the case for civil aviation's long-term aspirational goal (LTAG) of achieving net zero carbon emissions by 2050, for example, through the pathways highlighted in ATAG's *Waypoint 2050* analysis[28]. Stakeholders need to be regularly updated on the performance, which is currently ensured through various mechanisms such as the annual ICAO LTAG stocktaking update. However, when communicating environmental goals, a few things should be considered:

KEY PRINCIPLES:

- Ensure that you communicate how the targets are based on robust methodologies such as those provided by the Science Based Targets initiative (SBTi) and offer a clear roadmap for emissions reductions.
- Each reference to the aviation sector's net zero target should be accompanied with examples of reduction efforts within the plan. Each reference to net zero targets must disclose how the purchase of carbon removal credits supports or will support neutralisation of residual emissions.
- Each reference must have a link to the full plan
- Distinguish between short-term (1-5 years), medium-term (5-15 years), and long-term (>15 years) goals.
- Make timelines and progress indicators available to the public.
- Include third-party verification and mechanisms for ongoing transparency.

27. https://www.europarl.europa.eu/doceo/document/A-9-2024-0056_EN.html
28. https://aviationbenefits.org/environmental-efficiency/climate-action/waypoint-2050/

EXAMPLE STATEMENT:

"We aim to reach net zero carbon emissions across our operations by 2050, in alignment with the aviation sector's long-term aspirational goal (LTAG)."

SUPPORTING DATA:

- **Baseline year**: 2019
- **Current emissions:** X.X million tonnes CO_2e (2024)
- **Short-term target:** Reduce operational emissions by 25% by 2030 through fleet/infrastructure modernisation, operational improvements, and a fuel blend including at least 5% SAF.
- **Long-term target:** Achieve net-zero carbon emissions by 2050 with a mix of efficiency improvements in our operations through $XX million investments in fuel-efficient aircraft/infrastructure, the use of SAF, and carbon removals.
- **Verification:** Targets validated by SBTi and progress tracked via annual ESG reporting with third-party verification.

TRANSPARENCY CHECKLIST:

- ✔ Total and scope-specific greenhouse-gas emissions
- ✔ Annual target progress
- ✔ Description of decarbonisation levers (e.g., SAF uptake, operational improvements)
- ✔ Share of emissions to be offset vs. directly reduced vs. addressed through carbon removal credits (for residual emissions only).

3.1. CARBON OFFSETTING

Carbon offsetting can be used in sustainability communications as long as it is not implied that offsetting eliminates aviation's environmental impact. For example, SBTi calls this 'Beyond Value Chain Mitigation' where a company takes responsibility for the impact of ongoing emissions but these do not form the basis for emissions reduction claims within the company's own direct operations or value chain. Carbon removal credits specifically can be used to address residual emissions (the portion of emissions remaining following significant emissions reduction efforts). By September 2026, it will most likely be unlawful within the European Union to use the term 'offsetting' to claim a reduced greenhouse gas impact of services. In any case, it must be clearly laid out how offsetting works, the types of projects funded, and their limitations. Terms such as *CO₂ compensated or climate-neutral flight* should be avoided. You should provide information about the scheme your organisation is using for the offsets. This scheme should be based on recognised standards and measurements, which can be objectively verified. If not, consumers and other stakeholders could be misled into thinking that products or processes themselves generate no, or few, emissions, when this is not the case. Make sure to distinguish between current achievements and future goals and avoid any unsubstantiated claims about the future. The same applies to insetting, which involves direct investment in emission-reducing activities within the company's own operations or supply chain. It is essential that any reference to insetting is clearly referenced, backed by data, and verifiable.

KEY PRINCIPLES:

- Do not suggest that purchasing offsets erases the environmental impact of flying.
- Do not use 'offsetting' to claim a reduced greenhouse gas impact of services or products.
- Explicitly state the emissions offset, verification standard, and project type.

RECOMMENDED LANGUAGE FOR USE:

- **Acceptable:** "We contribute to certified carbon reduction projects, such as reforestation through our partnership with [name specific initiative]. These projects are independently verified, including [name standard or third-party verification]. Learn more about how offsets are calculated and the impact of each project here: [insert link to page with additional information]."
- **Avoid:** "Fly climate-neutral!" or "Offset carbon emissions and fly green!"

TRANSPARENCY CHECKLIST:

- ✔ Clear description of the offset projects
- ✔ Identification of the certifying body
- ✔ Clarification that offsets do not remove the emissions caused by the flight itself
- ✔ Accessible link to offset program/project details

EXAMPLE[29]

✓ CORRECT

Consumers go to a provider's website to buy an airline ticket. The option for compensating carbon emissions appears on the page. Below that option, there is a text box with the following information:

> *Flying causes a lot of carbon emissions. With this option, you can invest in projects that capture CO_2 from the air or prevent CO_2 emissions from occurring elsewhere. Investing in these projects does not mean that your flight itself becomes climate neutral. You can support the following initiatives: [...]*

On its website, the company then offers information about the projects it takes part in for the compensation of carbon emissions, where these take place, and what certification body has approved them. Below that text, it is exactly stated how much carbon emissions can be compensated with the passenger's contribution and how this has been calculated.

The claim meets the requirements because:

- It is factual
- It does not give the impression that CO_2 compensation suddenly makes flying sustainable or green
- The company explains what CO_2 compensation is and what the effect is
- The company clearly indicates how much CO_2 emissions are compensated and explains the calculation of the amount of CO_2 compensation
- The company clearly indicates which projects it supports, where these projects take place, and whether they have been certified, and what those certificates are.

✗ INCORRECT

Consumers go to a provider's website to buy an airline ticket. They see an option on the company's website that says *Fly Green.* Below that option is a text box with the image of a green leaf next to it. It reads:

> *Did you know that trees absorb CO_2? You can now neutralise the carbon emissions of your flight and make a difference! Your contribution goes to projects that capture CO_2 from the air, such as forest conservation projects.*

The claim is misleading because:

- The company does not indicate how much CO_2 is compensated
- Consumers get the overall impression that flying with CO_2 compensation does not negatively impact the environment, which is supported by the use of the claim Fly Green
- The company gives the impression that flying is climate-neutral if consumers pay for CO_2 compensation
- The company fails to explain how the offsets are calculated
- The company does not give any explanation about the CO_2 compensation projects.

29. https://www.acm.nl/system/files/documents/guidelines-sustainability-claims_1.pdf

3.2. NET ZERO

A similar problem can also arise where an organisation or civil aviation as a sector make claims about net zero or carbon neutrality targets. Given that these terms can be misunderstood by consumers and other stakeholders alike, claims should be as clear as possible, outlining what your organisation is doing and how it is doing it. Make sure that you use the correct terminology and include accurate information about whether and how your organisation is actively reducing the carbon emissions created in the production of its products or delivery of its services. Make sure to include information near the claim where any viewers can go and find more information about the claim, the measurements and standards used to verify the claim, and the exact pathways to get to net zero carbon emissions. Generally, it is recommended to use terms such as *low-carbon* or *lower carbon emissions* over terms such as *carbon neutral* or *net zero carbon emissions* in your company-specific sustainability communications unless you speak about the sector-wide net-zero goal. However, you must not use these terms if you only rely on offsets. Each reference to the aviation sector's net zero target should be accompanied with examples of reduction efforts within the plan and each reference to net zero targets must disclose offsetting (if applicable).

EXAMPLE[30]

✔ CORRECT	✘ INCORRECT
A social media post on a company's LinkedIn account reads:	A social media post on a company's LinkedIn account reads:
'One of the key elements in our mission to reduce carbon emissions, is innovation. The introduction of a hydrogen-powered engine technology will support the aviation sector's long-term goal of net zero carbon emissions by 2050. This innovation can reduce carbon emissions by over 30% compared to the current industry standard. Click here to learn more about this innovation and our commitments'.	*'Sustainability is at the heart of everything we do. We are on a journey to reach net zero, reducing emissions and taking off to a greener and prosperous future by investing in cutting-edge technology'.*

WHY IT WORKS:

- Clearly states a long-term commitment rather than implying immediate impact
- Outlines a specific measure to reduce emissions, including a short explanation on how much carbon emissions can be saved
- Links to a website that includes more details on the technology itself and how it supports the net-zero target. The website should also contain more information on the actions taken to achieve net zero carbon emissions and, on the measurements, and standards used to calculate the 30% emission reduction mentioned in the post

WHY IT IS MISLEADING:

- Vague wording ('sustainability', 'on a journey') without a concrete plan or timeline
- Lacks clarity on the actual emission reductions and what type of emissions will be reduced
- Lacks transparency and specific measures on the actual environmental impact that will make the future 'greener' and 'prosperous'
- Lacks detail on the type of technology that will contribute to the company's journey to net zero

---

30. https://www.acm.nl/system/files/documents/guidelines-sustainability-claims_1.pdf

3.3. SUSTAINABLE AVIATION FUELS

Sustainable Aviation Fuel (SAF) is one of the key terms used when communicating about aviation's 2050 goal. However, SAF has also been a subject of debate on whether the claim 'sustainable' could be misleading. The latest example is a study by Tilburg University and commissioned by the European Consumer Organisation (BEUC) about the use of SAF in B2C commercial communications.[31] Published in September 2024, the study concluded that the term SAF is prohibited on legal grounds of the EU's Unfair Commercial Practices Directive (UCPD). This assessment is based on the 'grammatical, structural and teleological interpretation of the applicable framework of EU law'. While the Tilburg University's assessment is in no way legally binding, it shows the extent of care that must be taken when using SAF in sustainability communications, especially B2C.

Case Study: SAF communications by one airline banned in the Netherlands[32]

In March 2024, the District Court of Amsterdam found that an airline had misrepresented the current potential of SAF to decrease the adverse environmental impacts of commercial flights. Two communications by the airline included claims that alternative aviation fuels are a 'sustainable fuel' and constitute a 'promising solution' for carbon emission reductions.

The court stated that *'although SAF can contribute to reducing the harmful environmental aspects of flying, the term "sustainable" here is too absolute and not concrete enough. The statement that it is a "promising solution" also paints too rosy a picture.*

The airline then does nuance the share of SAF and its application on a larger scale to some extent, but given the firm starting claim "Sustainable aviation fuel: a promising solution", it does not do so sufficiently. At the moment, SAF's share in total fuel consumption (and thus in carbon emissions reduction) is still very limited due to various reasons. A more substantial share can only be expected in the distant future and is thus uncertain. The expression is therefore misleading'.

The term SAF has of course become part of the nomenclature of the global aviation industry and is used by governments and industry bodies around the world.[33] The EU's ReFuelEU Aviation regulation promotes the increased use of SAF as the 'single most powerful tool to decrease aviation CO_2 emissions' and has set out an official definition of SAF in Article 3(7) of the ReFuelEU Aviation regulation.[34] It covers drop-in aviation fuels compliant with the sustainability criteria of the Renewable Energy Directive (RED). SAF are defined as:

- **Synthetic aviation fuels** from renewable hydrogen and captured carbon (in the meaning of Article 2(36) of RED and limited to liquid drop-in fuels only);
- **Advanced biofuels** from waste and residues (produced from feedstock listed in Part A of Annex IX, in the meaning of Article 2(34) of RED);
- **Biofuels** produced from oils and fats (such as from feedstock listed in Part B of Annex IX, in the meaning of Article 2(33) of RED);
- **Recycled carbon aviation fuels** in the meaning of Article 2(33) of RED.

---

31. *https://repository.tilburguniversity.edu/server/api/core/bitstreams/c419e899-5642-4dae-83c9-118e9878463a/content*

32. *District Court of Amsterdam 20 March 2024, ECLI:NL:RBAMS:2024:1512 (Fossielvrij/KLM). See for an analysis P.W.J. Verbruggen, 'De regulering van misleidende milieuclaims: Over fossielvrij/KLM en verder' (2024) Tijdschrift voor consumentenrecht & handelspraktijken, p. 124-132.*

33. *https://www.icao.int/environmental-protection/pages/SAF.aspx*

34. *https://transport.ec.europa.eu/transport-modes/air/environment/refueleu-aviation_en*

While SAF is critical to aviation's path to net zero carbon emissions, communications should reflect its current scale, limitations, and future potential. Claims that portray SAF as a blanket solution or use overly broad terms such as 'clean' or 'eco-friendly' risk misleading audiences. When using environmental claims that include the term SAF, try to avoid absolute and ambiguous terms such as eco-friendly, green, clean skies. It is important to explain the context in which SAF is referred to and to not overstate or exaggerate its immediate impact. Make sure to provide transparency and accurate information about SAF and how it is used at your organisation to reduce lifecycle climate impact. This can be done in the form of a footnote or link where you add more details on SAF use and its potential.

In your communications, include the exact quantity of neat SAF that has been supplied to the system and make sure to substantiate the claim, if possible, by quantifying the emissions reduction achieved. This can be supported by more general information, for example that 'on average, SAF can reduce lifecycle carbon emissions by up to 80% compared to traditional jet fuel'. Emphasise that SAF use is still in the early stages across the global aviation industry and clarify the expected emissions reductions by SAF based on verified data.

KEY PRINCIPLES:

- Avoid suggesting that SAF can immediately or independently resolve aviation's climate impact. It is still limited in availability and deployment.
- Include the exact quantity of neat SAF that has been supplied to the system and, if possible, quantify the emissions reduction achieved.
- Mention that emissions reductions from SAF are on a *lifecycle basis*.
- Avoid claims that suggest SAF use in a flight renders it carbon neutral.
- Provide context around SAF availability and current usage rates.

RECOMMENDED LANGUAGE FOR USE:

- **Acceptable** (if the flight has <u>physically</u> been refueled with blended SAF):

  "This flight uses a fuel blend that includes 10% Sustainable Aviation Fuel (SAF). Depending on the feedstock and production pathway, SAF has the potential to offer lifecycle CO_2 emissions reductions of up to 80% compared to conventional jet fuel - actual reductions may vary." *

  This statement is only acceptable if the flight has <u>physically</u> been refueled with blended SAF. Since the purchase of SAF is generally separated from the physical delivery of SAF molecules, it would be misleading in most instances to say a particular flight uses SAF or has uplifted SAF. If SAF is supplied through Book and Claim, an airline can say that it has purchased a certain amount of SAF at a particular airport (as long as it is not implying its physical use on a particular flight).

- **Acceptable** (if SAF is supplied through Book and Claim):

  "In 2025, we are purchasing XX tonnes of SAF that will be supplied to XX airports across the world to reduce CO_2 emissions. Depending on the feedstock and production pathway, SAF has the potential to offer lifecycle CO_2 emissions reductions of up to 80% compared to conventional jet fuel - actual reductions may vary."

  Optional disclaimer: "While SAF can significantly reduce carbon emissions on a life-cycle basis compared to traditional jet fuel, current volumes are limited, and widespread adoption will take time. This is one of many steps towards our long-term decarbonisation goals."

- **Avoid:** "This is a green flight" or "Fly carbon neutral with SAF."

TRANSPARENCY CHECKLIST:

- ✔ Include the exact quantity of neat SAF that has been supplied to the system
- ✔ Reference the source of average emissions reduction estimates and ideally also the SAF production pathway (e.g. HEFA - UCO etc.)
- ✔ Include disclaimers where SAF use is limited by supply or scale (see below)
- ✔ Provide links or footnotes with SAF definitions

✓ BEST PRACTICE:

EXAMPLE POST FOR SOCIAL MEDIA:

We are committed to reducing our carbon footprint, and sustainable aviation fuel (SAF) plays an important role in this transition. By incorporating SAF into our operations, we are taking steps towards lower carbon emissions. (ideally include the exact amount of SAF supplied to the system)

Did you know? *On average, SAF has the potential to reduce CO_2 emissions by up to 80% compared to traditional jet fuel over its lifecycle. ** While SAF usage is still in its early stages, scaling up production and adoption will be key for global aviation to reach net zero carbon emissions by 2050.*

Learn more about SAF and its impact here: [link]

**Emission reductions depend on feedstock, production process, and lifecycle analysis.

4. CONCLUSION AND A COMMITMENT TO TRANSPARENCY

Clear, accurate, and responsible sustainability communication is essential for building trust with passengers, partner businesses, and regulators. As the aviation industry continues its transition towards net zero carbon emissions by 2050, it is crucial that environmental claims are transparent, verifiable, and free from exaggeration. Misleading or unsubstantiated statements can undermine credibility and the genuine progress the global air transport industry has made over the last years.

The landscape of sustainability is constantly evolving, with innovation, new technologies, and stricter regulations. These changes require all organisations in the civil aviation industry to continuously review their sustainability communications and ensure that environmental claims remain valid, based on the latest verified data and scientific evidence, and compliant with applicable laws.

By upholding these principles, the global aviation sector can foster greater confidence in its environmental efforts and contribute to a more informed and engaged public. Transparent and responsible messaging not only strengthens corporate reputation but also reinforces the industry's shared commitment to achieving meaningful and lasting emissions reductions.

5. GREEN CLAIMS CHECKLIST FOR COMMUNICATORS IN AVIATION

We encourage all parts of the aviation sector to communicate about their climate action – we have a great story to tell and the vision for net zero air transport is an important driver of continued progress. But we need to ensure that we communicate well. There is an important balance between making a message accessible and consumer-friendly, whilst also conveying information in a fulsome way.

This checklist summarises the key principles from ATAG's *Sustainability Communications Guidebook* to help communications professionals in the aviation sector navigate environmental claims responsibly.

Use this checklist as a quick reference when drafting, reviewing, or approving communications that include environmental claims – from social media posts and press releases to website copy and advertising.

FIRST PRINCIPLE

What will the average consumer understand from this communication?

PRINCIPLES FOR ENVIRONMENTAL CLAIMS

Is the claim truthful?

Is your claim substantiated and verified (especially with outside verifiers)?

Have you verified your claim?

Is the language clear and unambiguous?

Have you avoided absolute terms such as *green, eco-friendly, ecological, sustainable?*

Does your claim consider the entire lifecycle of the product/service?

Have you added relevant context?

Have you ensured that the visuals, colours and icons used cannot be considered misleading?

If you make a forward-looking claim, have you made sure to cite a relevant strategy and roadmap?

NET-ZERO CLAIMS

Are any climate-related claims supported by science-based targets and verified data?

Have you referenced your carbon reduction plan near the claim?

Have you included examples for reduction efforts?

Have you distinguished between short-, medium-, and long-term goals?

NET-ZERO CLAIMS

Are any timelines and progress indicators relevant to your claim accessible by the public?

Does your claim cover the total and scope-specific greenhouse gas emissions?

Do you reference the annual target progress?

Do you reference the decarbonisation levers?

Does your claim clearly differentiate between offsets vs. directly reduced emissions vs. carbon removals?

Could you replace the term *net zero* or *carbon neutral* with recommended terms such as *low-carbon* or *lower carbon emissions?*

CLAIMS ON CARBON OFFSETTING

Have you avoided that your claim implies that offsets erase the environmental impact of flying?

Have you ensured that you do not use the term *offsetting* to claim a reduced greenhouse gas impact of services or products?

Have you explicitly stated the emissions offset, verification standard, and project type?

Have you described the offset projects?

Have you mentioned the certifying body?

Have you clarified that offsets do not remove emissions caused by the flight itself?

Have you referenced the offset programme?

CLAIMS ON SUSTAINABLE AVIATION FUELS (SAF)

Have you ensured that your claim is not suggesting that SAF can immediately or independently resolve aviation's climate impact?

Have you mentioned that SAF is still limited in availability and deployment?

Have you included the exact quantity of neat SAF that has been supplied to the system?

Have you quantified the emissions reduction in your claim?

Have you mentioned that emissions reductions from SAF are on a life-cycle basis?

Have you avoided making any claim that suggests SAF renders the flight itself carbon neutral?

Have you referenced the source of emissions reductions estimates?

Have you referenced the SAF production pathway (if possible)?

Have you provided links or footnotes with SAF definitions?

6. REFERENCES

Air Transport Action Group (ATAG). Waypoint 2050: A Strategy for Net-Zero Aviation. Available at: https://aviationbenefits.org/environmental-efficiency/climate-action/waypoint-2050/

BEUC - The European Consumer Organisation. The Great Green Maze: How Environmental Advertising Confuses Consumers. 2023. Available at: https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-149_The_Great_Green_Maze_How_environmental_advertising_confuses_consumers.pdf

Bird & Bird. Green Claims and Greenwashing: A Legal Update. 2024. Available at: https://www.twobirds.com/en/insights/2024/singapore/green-claims-and-greenwashing-a-legal-update

Bird & Bird. Green Claims in Australia. 2024. Available at: https://www.twobirds.com/en/trending-topics/green-claims/australia

Bird & Bird. Green Claims: Legal Considerations for Businesses. Available at: https://www.twobirds.com/en/trending-topics/green-claims

Business Travel News Europe. Virgin Atlantic 'Flight 100' Advert Banned Over Misleading SAF Claim. Available at: https://www.businesstravelnewseurope.com/Air-Travel/Virgin-Atlantic-Flight-100-advert-banned-over-misleading-SAF-claim

CBC News. What on Earth? Fossil Fuel Ads Under Scrutiny. Available at: https://www.cbc.ca/news/science/what-on-earth-fossil-ads-1.7347240

Competition Bureau Canada. Environmental Claims and Greenwashing. Available at: https://competition-bureau.canada.ca/how-we-foster-competition/education-and-outreach/environmental-claims-and-greenwashing

European Commission. Commission Proposes New Rules to Tackle Greenwashing and Protect Consumers from Misleading Environmental Claims. 22 Jan. 2024. Available at: https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_24_2322/IP_24_2322_EN.pdf

European Commission. EU Introduces Flight Emissions Label for More Informed and Sustainable Travelling. 18 Dec. 2024. Available at: https://transport.ec.europa.eu/news-events/news/eu-introduces-flight-emissions-label-more-informed-and-sustainable-travelling-2024-12-18_en

European Commission. Green Claims - Ensuring Reliable Environmental Information for Consumers. Available at: https://environment.ec.europa.eu/topics/circular-economy/green-claims_en

European Commission. Green Claims - Ensuring Reliable Environmental Information for Consumers. Available at: https://environment.ec.europa.eu/topics/circular-economy/green-claims_en

European Commission. ReFuelEU Aviation - Boosting Sustainable Aviation Fuels in Europe. Available at: https://transport.ec.europa.eu/transport-modes/air/environment/refueleu-aviation_en

European Commission. Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending 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 (Text with EEA relevance). Available at : https://energy.ec.europa.eu/news/new-eu-rules-empower-consumers-green-transition-enter-force-2024-03-27_en

European Parliament. Report on the Proposal for a Directive on Substantiation and Communication of Explicit Environmental Claims (Green Claims Directive). A9-0056/2024. Available at: https://www.europarl.europa.eu/doceo/document/A-9-2024-0056_EN.html

European Parliament. Report on the Proposal for a Directive on Substantiation and Communication of Explicit Environmental Claims (Green Claims Directive). A9-0056/2024. Available at: https://www.europarl.europa.eu/doceo/document/A-9-2024-0056_EN.html

European Parliament. Stopping Greenwashing: How the EU Regulates Green Claims. 11 Jan. 2024. Available at: https://www.europarl.europa.eu/topics/en/article/20240111STO16722/stopping-greenwashing-how-the-eu-regulates-green-claims

European Union. Directive (EU) 2024/825 on the Substantiation and Communication of Explicit Environmental Claims (Green Claims Directive). Available at: https://ec.europa.eu/commission/presscorner/detail/en/ip_23_1692

Government of India. Guidelines for Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024. Available at: https://consumeraffairs.nic.in/sites/default/files/file-uploads/latestnews/Greenwashing_Guidelines.pdf

International Civil Aviation Organization (ICAO). Sustainable Aviation Fuels (SAF). Available at: https://www.icao.int/environmental-protection/pages/SAF.aspx

IPCC. Special Report: Global Warming. Glossary. Available at: https://www.ipcc.ch/sr15/chapter/glossary/

Morgan, Lewis & Bockius LLP. Forging a United Front: UK Regulators Take Steps to Combat Greenwashing. March 2024. Available at: https://www.morganlewis.com/pubs/2024/03/forging-a-united-front-uk-regulators-take-steps-to-combat-greenwashing

The Netherlands Authority for Consumers and Markets (ACM). Guidelines on Sustainability Claims. Available at: https://www.acm.nl/system/files/documents/guidelines-sustainability-claims.pdf

The Netherlands Authority for Consumers and Markets (ACM). Guidelines on Sustainability Claims. Available at: https://www.acm.nl/system/files/documents/guidelines-sustainability-claims_1.pdf

The Netherlands Authority for Consumers and Markets (ACM). Guidelines Regarding Sustainability Claims (Version 2, 2023). Available at: https://www.acm.nl/system/files/documents/guidelines-sustainability-claims.pdf

Press Information Bureau, Government of India. Advisory Issued to Prevent Greenwashing in Environmental Claims. 4 Feb. 2024. Available at: https://pib.gov.in/PressReleasePage.aspx?PRID=2064963

Reuters. Dutch Advertising Board Finds Against MSC Cruise in Greenwashing Complaint. 2 Oct. 2024. Available at: https://www.reuters.com/business/dutch-advertising-board-finds-against-msc-cruise-greenwashing-complaint-2024-10-02/

The Guardian. Air France, Lufthansa, and Etihad Ads Banned for Misleading Environmental Claims. 6 Dec. 2023. Available at: https://www.theguardian.com/media/2023/dec/06/air-france-lufthansa-etihad-ads-banned-misleading-claims-advertising-environmental

The Guardian. Airline Green Adverts Banned in the UK: Lufthansa Case. 1 Mar. 2023. Available at: https://www.theguardian.com/business/2023/mar/01/airline-green-adverts-banned-uk-lufthansa-asa

The Guardian. Lloyds Advert Banned for Making False Environmental Claims. 18 Dec. 2024. Available at: https://www.theguardian.com/business/2024/dec/18/lloyds-advert-banned-for-making-false-environmental-claims

Tilburg University. Greenwashing and Consumer Protection: A Legal Perspective. Available at: https://repository.tilburguniversity.edu/server/api/core/bitstreams/c419e899-5642-4dae-83c9-118e9878463a/content

UK Government. Guidance for Businesses on Making Environmental Claims. Available at: https://assets.publishing.service.gov.uk/media/61482fd4e90e070433f6c3ea/Guidance_for_businesses_on_making_environmental_claims_.pdf

UK Government. Guidance on Environmental Claims on Goods and Services. Available at: https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims/environmental-claims-on-goods-and-services#summary

United Nations. Net Zero Coalition. Available at: https://www.un.org/en/climatechange/net-zero-coalition

United Nations Environment Programme (UNEP). UN Environment Walks the Talk on Carbon Neutrality. Available at: https://www.unep.org/news-and-stories/story/un-environment-walks-talk-carbon-neutrality

United States Federal Trade Commission (FTC). Guides for the Use of Environmental Marketing Claims (Green Guides). Available at: https://www.ftc.gov/news-events/topics/truth-advertising/green-guides