

# Sustainable Purchasing: How to Spot Greenwashing



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This guide has been developed from the [South Ken ZEN+ Supply Chain Charter](#), a shared commitment by members of the Exhibition Road Cultural Group to raise the bar on sustainable purchasing.

In South Kensington, Purchased Goods & Services make up around 60% of our neighbourhood carbon footprint. Whether you're formally responsible for making purchasing decisions or simply sourcing products and services as part of your role, your choices can make a meaningful contribution to our sustainability goals.

Greenwashing happens when organisations exaggerate or misrepresent their environmental performance. It can take many forms, vague claims, selective data, or marketing that looks "green" but lacks evidence.

That's where this guide comes in. It's designed to help you spot the signs of potential greenwashing and know what to ask if you're presented with vague or unsubstantiated claims.

This guide is intended primarily for members of the Exhibition Road Cultural Group, and we hope its advice, tools, and signposts prove useful to a much wider audience.

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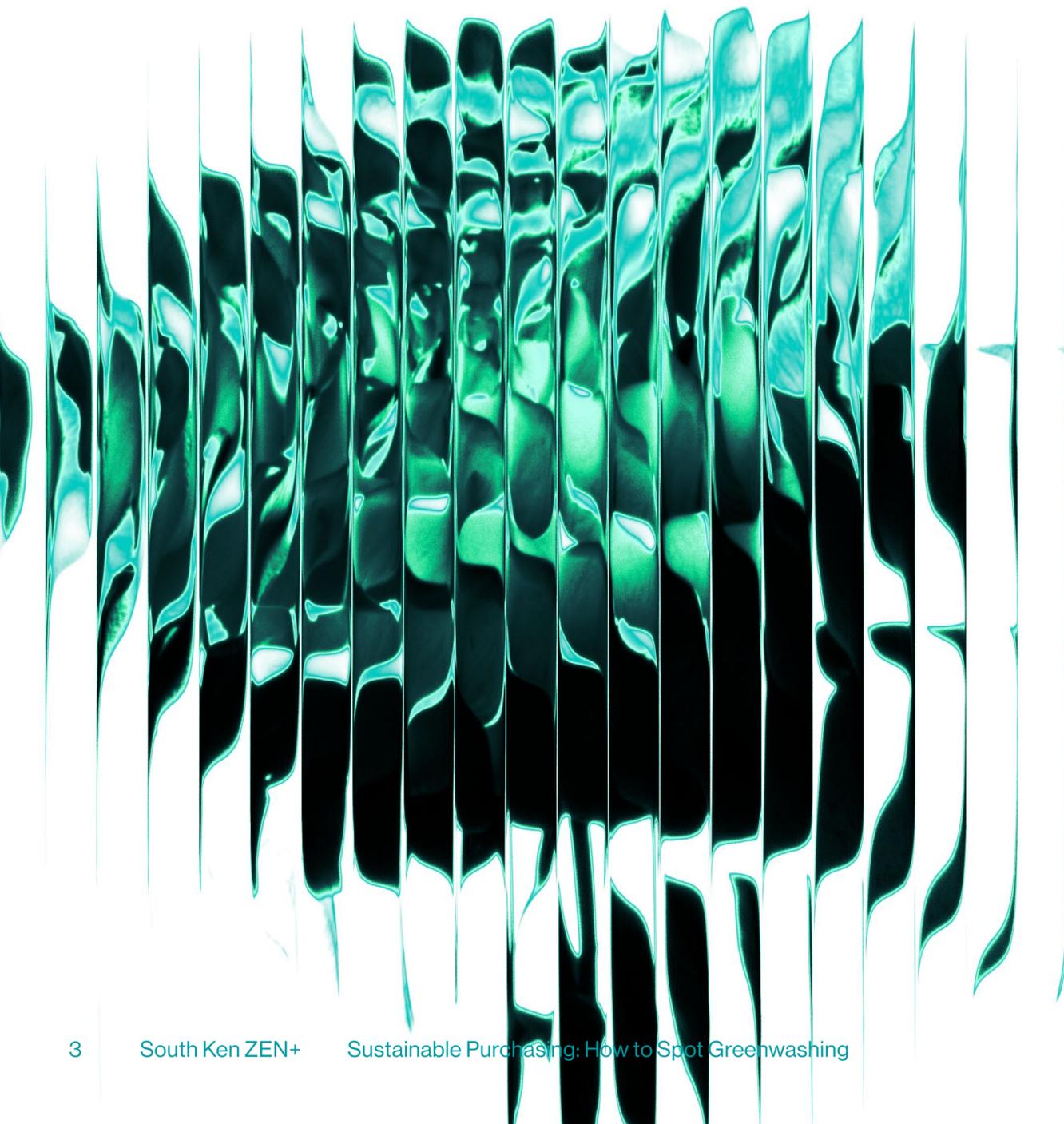
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# Top tips for spotting greenwashing



Short on time? Here are the at-a-glance essentials for how to spot greenwashing.

Sustainability claims can be nuanced and not always what they seem. Whether you're reviewing a product, a service, or a supplier's broader strategy, it's worth pausing to ask: *is this claim credible, clear, and meaningful?*

Here are the key considerations to help you assess supplier claims with confidence. Each point links to more detailed guidance if you want to dig deeper.

## Focus on substance over style

Sustainability isn't always what it looks like. A product or service might be wrapped in green branding, but that doesn't mean it's environmentally sound. Instead of relying on visual cues or buzzwords, dig into what's actually being claimed and whether it's meaningful.

### Learn more:

- Decoding terminology and imagery

## Ask for evidence

Credible claims are specific and backed by proof. Look for SMART targets, third-party certifications, and publicly available strategies or reports. If a supplier can't show how they're making a difference, it's worth asking why.

### Learn more:

- Seeking transparency
- Decoding certifications
- Understanding net zero
- Understanding offsetting

## Consider the full impacts

A single green feature doesn't tell the whole story. Consider the product's full lifecycle, from sourcing to disposal, and look at the broader supply chain as well as the company's context. Be clear on whether claims relate to the product, packaging, or both. Terms like "recyclable" or "compostable" should be accurate and supported by disposal guidance.

### Learn more:

- Think about the bigger picture
- Beyond the bare minimum
- Impact throughout lifecycle
- Understanding waste



## Purpose

This guide is designed to help members of South Ken ZEN+ make informed decisions when encountering environmental or “green” claims. It aims to raise awareness of why these claims matter, outline the legal requirements, and provide practical tips for avoiding misleading or vague statements. By using this guide, staff can confidently assess claims without needing specialist sustainability knowledge or extensive research.

## Scope

The guide focuses on environmental claims made about products and services such as “eco-friendly,” “sustainable,” or “carbon neutral” that can influence purchasing decisions. It does not cover technical standards or certification schemes in detail but provides a starting point for understanding what good practice looks like and how to spot potential greenwashing.

## What is greenwashing?

In the UK, green claims like saying a product is “eco-friendly” or “100% sustainable” are regulated under consumer protection law. The Competition and Markets Authority (CMA) has developed the [Green Claims Code](#), which sets out six principles to help businesses avoid misleading claims. These are: to be truthful, clear and unambiguous, evidence-based, consider the full product lifecycle, without omitting or hiding important information, and with fair and meaningful comparisons. These apply to everything from product labels to tender documents and supplier websites.

Since April 2025, the Digital Markets, Competition and Consumers Act gives the CMA power to fine businesses up to 10% of global turnover for misleading commercial practices.

The Advertising Standards Authority (ASA) enforces rules to ensure environmental claims in marketing are accurate and not exaggerated. For financial products,

the Financial Conduct Authority (FCA) applies an anti-greenwashing rule under its Sustainability Disclosure Requirements.

Vague or unverified claims can lead to enforcement action, reputational damage, and financial penalties. Buyers and procurement teams should ensure that any green claims made by suppliers are transparent, evidence-based, and proportionate to the actual environmental benefit when making purchasing decisions.

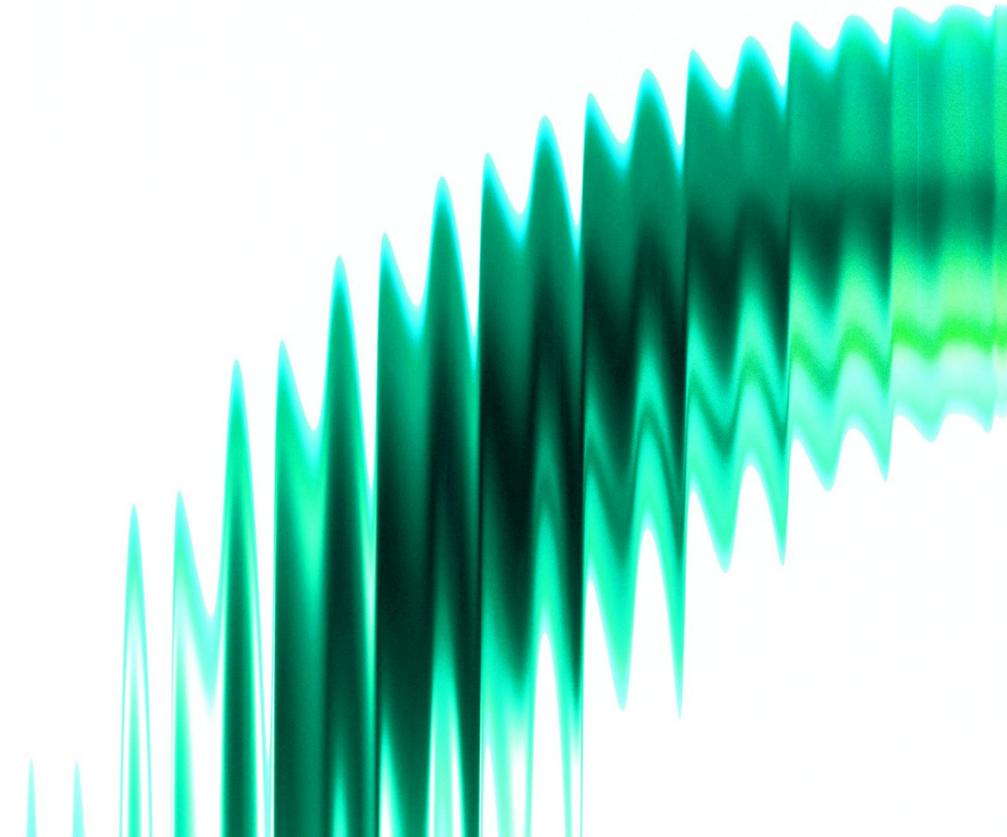
## Evaluating Claims

Now that we’ve explored the legal landscape and why greenwashing matters, from reputational risk to regulatory scrutiny, it’s time to turn awareness into action.

This guide is designed to help you confidently assess environmental claims made by suppliers. Whether you’re reviewing a product description, a tender submission, or a sustainability report, the goal is the same: to separate genuine progress from misleading promises.

We’ll walk through the key principles of credible claims, highlight common red flags, and provide practical tools to support your decision-making. Each theme from the quick reference guide is unpacked in its own one-pager, so you can dive deeper into the areas most relevant to your role or purchase.

Think of this as your toolkit for making informed, proportionate decisions aligned with our South Ken ZEN+ Supply Chain Charter and our shared ambition for a zero emissions, nature-positive neighbourhood.



# Decoding terminology & imagery

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Sustainability claims can use language and visuals to convey environmental benefits. When evaluating environmental claims on products or services, be alert to generic wording. Don't just rely on the marketing and be sure to read the full description.

## What you need to know

- Generic terms like “eco-friendly”, “green”, “natural” or “sustainable” sound positive but can be meaningless without clear explanations of what makes the product environmentally preferable.
- Look for specificity. Claims are expected to provide specific information e.g. recycled content percentage, certified materials, lifecycle impacts etc.
- Imagery such as leaves, trees, water droplets, or wildlife, can be used to visually communicate environmental benefits; but avoid relying on imagery or emotional cues unless they are backed by clear evidence of the environmental benefit.
- Look for clarity. Strong claims explain how a product or service is sustainable, what standards it meets, and why it performs better than alternatives.

## Things to watch out for

- Does a claim use a broad term? If so, can the supplier explain the specific environmental benefit behind it and provide evidence of how that benefit was measured?
- Can a supplier explain what makes this product or service environmentally preferable to alternatives?
- Can a supplier confirm which certifications, standards or recognised frameworks the product or service meets?

## Examples

### Good example

A logistics company using green imagery alongside transparent data on fleet emissions, fuel efficiency improvements, and investment in electric vehicles.

### Bad example

A clothing brand using the term “sustainable fashion” without disclosing material sourcing, production practices, or labour conditions.

### Real life example

ASOS, Boohoo, and George at Asda were investigated by the Competition and Markets Authority (CMA) for misleading claims about their “eco” fashion ranges, including the use of ambiguous terms like “responsible” and “sustainable,” and imagery that exaggerated environmental benefits. ([Source](#)).



# Seeking transparency



Under the Green Claims Code and the Digital Markets, Competition and Consumers Act (DMCC), environmental claims must be specific, truthful, and supported by evidence. Transparency isn't optional, it is a legal requirement.

## What you need to know

- Clear, accessible information is essential for understanding whether an organisation is genuinely addressing its environmental impacts.
- A transparent claim sets out what is being measured, how it is measured, and what progress has been made. This may include methodologies, data sources, limitations, and any third-party verification.
- Being transparent doesn't mean having perfect performance; it means being open and honest about challenges as well as achievements.
- A lack of transparency can be a warning sign. If a company makes strong environmental claims but shares little detail, or only highlights positive data, it may be presenting a selective or misleading picture.

- Look for organisations that publish sustainability reports, disclose targets and progress, and are open about their supply chains, materials, and operations.
- Claims involving offsets or certifications should also be clearly explained.

## Things to watch out for

- What evidence can suppliers provide to support their environmental claim?
- Does the supplier publish sustainability or impact reports, and how can they be accessed?
- Is any of the supplier's environmental information checked or verified by an independent organisation?

## Examples

### Good example

A fashion company publishes detailed impact assessments including carbon emissions, water usage and material sourcing, and openly shares information about suppliers. It also acknowledges where they fall short (such as environmental cost of synthetics) and explain what it is doing to improve.

### Bad example

A retailer promoting “sustainable products” without providing any information on materials, production methods, or supplier standards.



# Decoding certifications



To help navigate the risks of companies or organisations who participate in greenwashing, there are many certifications which provide reassurance that the company or organisation has met certain standards.

## What you need to know

- Certifications help to demonstrate businesses meet legal or industry requirements as well as providing a framework for continuously improving environmental performance.
  - These certifications can provide proof that a business operates sustainably and adheres to verifiable environmental practices.
  - In order to meet the requirements of a certified standard, the organisation will have been evaluated or audited by a third-party organisation against a set of environmental criteria. This may be on the entire company's activities or on specific areas e.g. operations, products, or individual buildings.
  - There are international standards; sustainable/environmental construction standards through to those which are industry specific (catering, hotels etc) and standards specific to products.
- The [logo guide](#) in the Appendix provides examples of certifications – but this list is not exhaustive. While organisations or companies holding these certifications or standards is a good start, don't be afraid to assess or scrutinise further.
  - If an organisation or company promotes a certification that you are unsure of, contact those in your organisation that will be able to advise you, e.g. Environmental Sustainability Team, Environmental Manager or Procurement Team.

## Things to watch out for

- Is the supplier using a widely-recognised certification? Or has the supplier made up their own certification?
- Has the certification been evaluated by a third-party organisation?
- What scope of the supplier's business does the certification apply to?

## Examples

### Good example

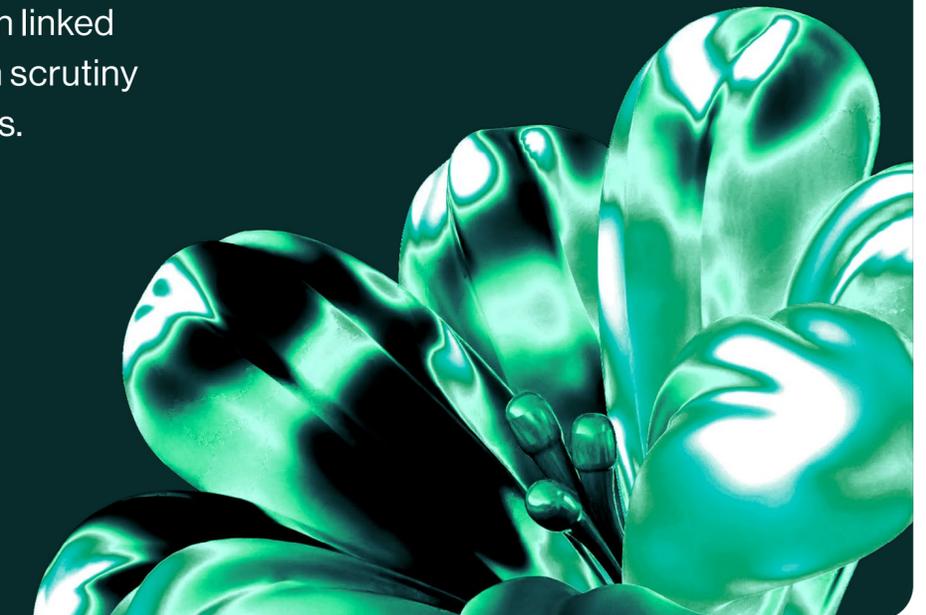
A furniture company provides data sheets on request, which provide information on the sourcing, proportion of recycled material, recyclability and the carbon emissions arising from each product's life cycle, e.g. production, transport, disposal.

### Bad example

A furniture company has sourced wood that has been certified, however investigations into the supply chain reveal that this has in fact been linked to illegal logging. Supply chain scrutiny is essential in assessing claims.

### Real life example

The BEUC (the European consumer organisation) reported to the EU that Coca-Cola was making misleading claims that its bottles were "100% recyclable" and "100% recycled". Coca-Cola voluntarily engaged with the European Commission and committed to changing its labelling practices to clarify that only the plastic body of the bottle is recycled and avoid giving the impression of a closed recycling loop. No fines were issued.



# Understanding net zero

To limit global warming to 1.5 degrees, governments, organisations and businesses need to reduce their greenhouse gas emissions (GHGs) to net zero. Claims of net zero can be misused as there is no universally agreed definition of “net zero”.

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## What you need to know

- **Science Based Targets Initiative** (SBTi) provides credible standards to set net zero targets which align to climate science. **Science-based net zero targets** require deep emissions reductions of at least 90% by 2050.
- Any remaining or residual emissions should be “offset” with activities that permanently remove and store GHGs from the atmosphere, such as planting trees or technological solutions to capture and store carbon.
- **Carbon neutral** means balancing emissions by offsetting, so unlike “net zero”, there’s no requirement to reduce emissions first.
- **Zero carbon** means no carbon is emitted at all. A future zero carbon society would not rely on fossil fuels for any energy generation or other processes.
- Carbon neutral is often used interchangeably with net zero, but they are not the same. Carbon neutrality means balancing emissions by offsetting, so unlike net zero, there’s no requirement to reduce emissions first. Additionally, carbon neutrality sometimes only relates to CO<sub>2</sub> emissions, not other greenhouse gases.
- At this stage, truly zero carbon products are near impossible to create and are probably reliant on offsetting instead of being genuinely zero carbon.
- Small and Medium Enterprises (SMEs) may struggle to commit to net zero due to limited resources and may require support to measure and communicate their sustainability progress. Look for early signs of environmental awareness and small-scale reduction efforts.



### ✓ Positive things to look for

- A net zero target date no later than 2050 (the legal requirement)
- A credible baseline year i.e. one that reflects a “normal” year of trading
- A science-aligned reduction of 90% by the target net zero date
- Target covers scope 1, 2 and 3
- Target validated by SBTi
- Credible roadmap to achieve net zero, or commitment to plan
- Evidence of reporting against progress
- Using established carbon accounting methodology, such as Greenhouse Gas Protocol or ISO 14064-1
- Targets are proportionate to the scale and type of the business and emissions hotspots

### 👁 Things to watch out for

- Claiming a company, product or service is “net zero” or “carbon neutral” with no evidence of carbon reduction
- Claiming “net zero” through offsetting only
- Claiming “net zero” with no target date, no reduction % or no baseline year
- Unrealistic net zero target dates, such as 2026
- Clarity on scopes included in net zero target
- Large companies with net zero targets that only include scope 1 and 2, and don’t include scope 3
- No plan to achieve net zero targets
- Emissions have increased in recent years

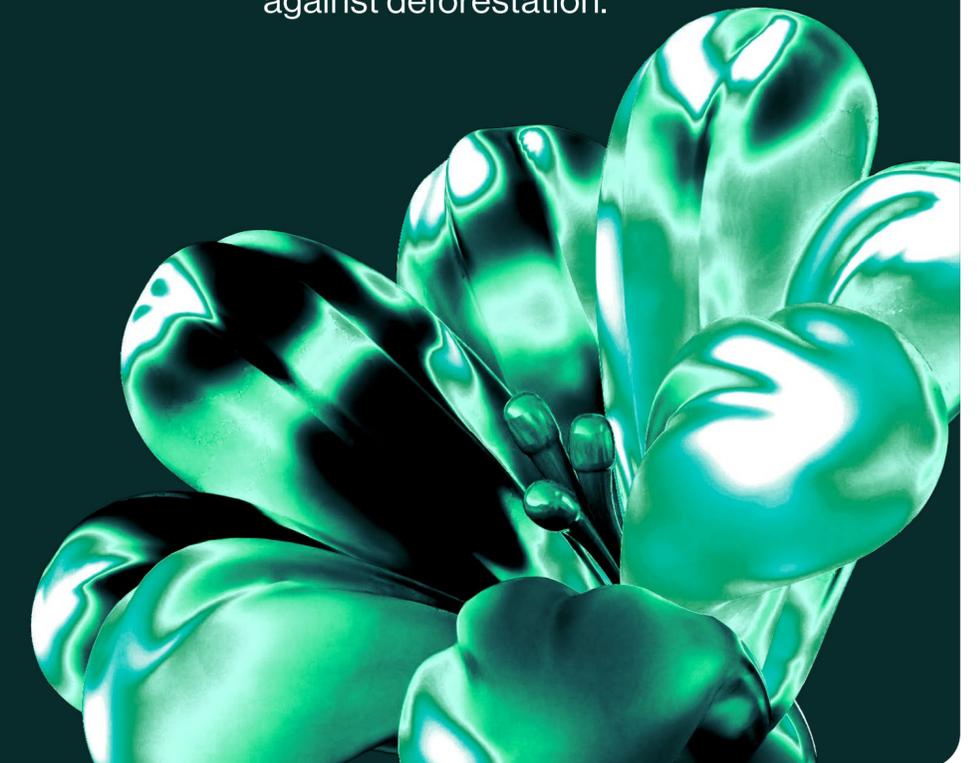
## Examples

### 👍 Good example

A company has set a net zero target to reduce scope 1, 2 and 3 emissions by 90% by 2040, with a near-term target to reduce emissions by 50% by 2030, which has been validated by SBTi. The company reports annually on its progress and has created a Transition Plan outlining how it will work towards the targets.

### 👎 Bad example

An airline company calls itself as a “carbon neutral airline” but does not have a net zero or emissions reduction target. It does not mention whether this claim applies to scope 1, 2 or 3. The company’s reported emissions have increased each year and it offsets emissions through the purchase of credits from organisations which claim to protect against deforestation.



# Understanding offsetting

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We are unlikely to be able to eliminate all of our emissions, and even after deep emissions cuts there will likely be some residual emissions from activities such as aviation and shipping. **Offsetting** will be required to achieve net zero.

## What you need to know

- **Carbon offsetting** is the removal of carbon dioxide from the atmosphere or a reduction in emissions with the intention of compensating for emissions made elsewhere. Most often, carbon credits are purchased to offset emissions.
- Many different terms are used to describe offsetting, including “balancing”, “compensation”, “neutralisation” or “carbon draw-down”.
- To reach net zero, SBTi requires companies to **neutralise** any residual emissions using permanent removals and storage.
- SBTi also recommends companies invest in **Beyond Value Chain Mitigation**. Companies should prioritise deep emissions cuts in their own emissions, and only then should invest beyond their own value chain.
- Investing in activities outside of the value chain may be considered by an organisation which is very advanced and ambitious in their climate action, and has already invested heavily in decarbonisation and overachieved their targets. Through investing in external projects, a company is contributing to climate finance initiatives which may not have other income streams.
- Carbon offsetting should be seen as a last resort, not a solution. It does not reduce carbon emissions at the source, and when companies and governments rely on offsetting without reducing emissions it allows them to continue with the high polluting, high consumption status quo.
- There is currently no regulation around offsetting but there is increasing scrutiny of companies’ carbon offsetting claims.

- Recent research indicates there are systemic problems with offsetting and many schemes are poor quality and do not actually help to lower emissions.
- The cost of offsets can range from £5-10 to £100+. Some offsetting projects can have wider environmental and socio-economic co-benefits, including enhancing biodiversity or providing lower cost energy. For more information, see the [types and cost of offsetting charts](#) on the next page.

## Positive things to look for

- Alignment to the Oxford Offsetting Principles
- Conducting due diligence and enhanced monitoring of offsetting projects
- Company has already made significant progress against its net zero targets
- Company has invested in decarbonisation, climate action and positive activities within its value chain
- Offsetting strategy is complemented by evidence of real action
- Project uses a verified standard

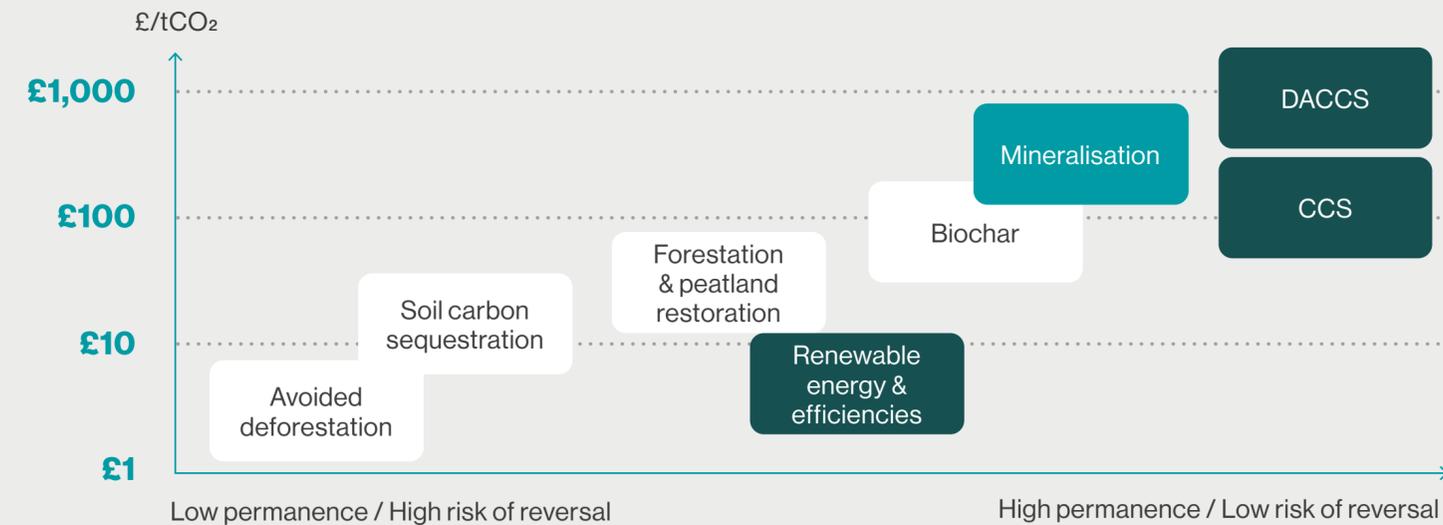
## Things to watch out for

- Company offsets with no carbon reduction efforts
- Company does not acknowledge need for carbon reduction
- Offsetting is the company’s only carbon reduction strategy
- Poor quality offsets with little evidence of the emissions reductions/removals claimed
- Project is not verified or validated by an external standard

## Types of offsets

	Biological	Geological	Engineered
<b>Removals</b>	<ul style="list-style-type: none"> <li>Afforestation/reforestation</li> <li>Habitat restoration (peatland, wetland, seagrass etc.,)</li> <li>Soil carbon sequestration</li> <li>Biochar</li> <li>Building with biomass</li> <li>Ocean fertilisation</li> </ul>	<ul style="list-style-type: none"> <li>Mineralisation</li> <li>Enhanced terrestrial weathering</li> <li>Ocean alkalinity</li> </ul>	<ul style="list-style-type: none"> <li>Bioenergy with carbon capture and storage (BECCS)</li> <li>Direct air capture with carbon storage (DACCS)</li> <li>Low carbon concrete</li> </ul>
<b>Reductions</b>	<ul style="list-style-type: none"> <li>Improved forest management / reduced deforestation</li> <li>Habitat conservation and avoided damage</li> </ul>	<ul style="list-style-type: none"> <li>N/a</li> </ul>	<ul style="list-style-type: none"> <li>Renewable energy projects</li> <li>Energy efficiencies</li> <li>Waste management</li> <li>Retrofitting</li> <li>Industrial carbon capture and storage (CCS)</li> </ul>

## Costs of offsets



Source: Indicative chart by 3ADAPT, based on information from multiple sources

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### Good example

A profitable professional services company which has decarbonised scope 1 and 2, and has demonstrated successful reduction of their scope 3 in line with their target, decides to invest their profits into climate action projects outside of their value chain.

### Bad example

A fossil fuel company purchases carbon credits for offsetting projects which do not actually result in emissions reductions.



# Think about the bigger picture



When assessing a supplier's sustainability credentials, it's also important for their strategy, reporting and actions to be proportionate to the size and nature of their business.

## What you need to know

- The expectations of activity, knowledge and progress vary based on company size – small, family-run organisations are unlikely to be focused on the same things as a global business.
- Business context is important too – a catering business that doesn't have policy around its food production emissions; or a courier company that doesn't mention its fuel emissions – are probably worthy of further scrutiny
- Consider the wider company picture – a claim could be focused on activities of a subsidiary or brand within a parent company. Similarly, smaller subsidiaries may defer to their parent company's sustainability policies and reporting may be published at the wider company level.

- The EU and UK Government already require reporting on a variety of Sustainability metrics, this can help you set your expectations of what your suppliers should be able to provide, based on their size.

## Things to watch out for

- Does the supplier's Sustainability Plan cover their largest sources of emissions, and if not, why not?
- Does the information you've received from the supplier look commensurate with what they are required to produce for a company of their size/turnover? If not, it is worth clarifying or discussing further.

## Examples

### Good example

A small courier business specialising in object travel has started to collect data relating to the fuel emissions of their journeys. They've used this information to plan routes more efficiently and have invested in electric vehicles where possible. This is relevant and proportionate to the business's key emissions sources and its size.

### Bad example

A large catering firm provides a Sustainability Policy that focuses on the office's replacement of all lighting for LED, a reduction in the use of printer paper and zero office waste to landfill. There is no mention of the organisation's core product/service. This policy misses the key sources of emissions for this type of business (e.g. food, waste and transportation) and is disproportionate to the actions expected of a business of this size.

### Real life example

In 2024 Lloyds Banking claimed in a LinkedIn ad that they were "committed to supporting the energy transition" by "reducing our reliance on fossil fuels" and "putting the weight of our finance into clean and renewable energy", but this was just relating to their operations and not their investments. The ASA ruled that the advert misled consumers by omitting this information, giving the impression that Lloyds was primarily financing renewables, when in fact it continued to support fossil fuel industries. ([Source](#))



# What to Expect from Companies Based on Size

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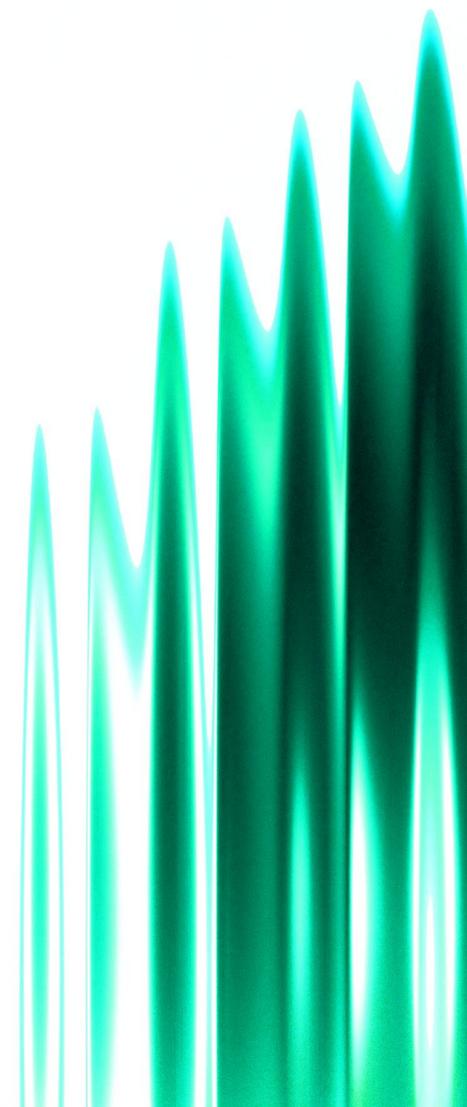
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Company Size	Criteria (any 2 of 3)	Key Sustainability Reporting Requirements	Relevant Regulations / Standards	Key
<b>Micro</b>	<ul style="list-style-type: none"> <li>Turnover ≤ £1M</li> <li>Balance sheet ≤ £500K</li> <li>≤ 10 employees</li> </ul>	<ul style="list-style-type: none"> <li>× Strategic Report</li> <li>× No mandatory sustainability disclosures</li> <li>× ESOS exempt</li> </ul>	Companies Act 2006	<ul style="list-style-type: none"> <li>✓ Mandatory</li> <li>× Not required</li> <li>★ Voluntary</li> </ul>
<b>Small</b>	<ul style="list-style-type: none"> <li>Turnover ≤ £15M</li> <li>Balance sheet ≤ £7.5M</li> <li>≤ 50 employees</li> </ul>	<ul style="list-style-type: none"> <li>× Strategic Report</li> <li>× No mandatory sustainability disclosures</li> <li>× ESOS exempt</li> <li>★ Voluntary reporting encouraged</li> </ul>	Companies Act 2006 VSME Framework (voluntary)	
<b>Medium</b>	<ul style="list-style-type: none"> <li>Turnover ≤ £54M</li> <li>Balance sheet ≤ £27M</li> <li>≤ 250 employees</li> </ul>	<ul style="list-style-type: none"> <li>✓ Strategic Report required</li> <li>✓ SECR applies if quoted, large unquoted, or LLP</li> <li>✓ ESOS applies if ≥250 employees and turnover &gt;£44 million</li> <li>✓ Modern Slavery Act statement applies if turnover ≥£36 million with a presence in the UK</li> <li>× TCFD not mandatory unless listed or PIE</li> </ul>	Companies Act 2006 SECR ESOS Regs 2014	
<b>Large</b>	Exceeds medium thresholds	<ul style="list-style-type: none"> <li>✓ Strategic Report</li> <li>✓ SECR mandatory if &gt;250 employees</li> <li>✓ ESOS mandatory</li> <li>✓ TCFD-aligned reporting mandatory if &gt;500 employees and £500M turnover</li> <li>✓ Modern Slavery Act statement</li> </ul>	Companies Act 2006 SECR ESOS IFRS S1/S2	
<b>Quoted Companies / PIEs (Public interest companies)</b>	Listed on UK exchange or defined as PIE (e.g. banks, insurers)	<ul style="list-style-type: none"> <li>✓ Full ESG mandatory</li> <li>✓ SECR mandatory</li> <li>✓ TCFD/ISSB-aligned climate reporting</li> <li>✓ ESOS applies if large</li> <li>✓ Transition plans (expected)</li> <li>✓ UK SRS S1 &amp; S2 (from 2026)</li> </ul>	FCA Listing Rules SECR 2018 UK SRS ISSB S1/S2	



# Beyond the bare minimum



Some companies or organisations may exaggerate or overstate the environmental benefits of their products or services, giving the impression that they are particularly sustainable.

In reality, they may simply be complying with minimum legal or regulatory requirements – standards that all businesses are required to meet. This practice can mislead consumers into believing that a company is going “above and beyond” for the environment, when in fact it is just doing the legal minimum.



## What you need to know

Understanding environmental legislation can be complex. If your organisation has an environmental legislative register, this is a useful reference point to review requirements for suppliers.

### Useful resources for checking relevant environmental legislation:

- [www.legislation.gov.uk](http://www.legislation.gov.uk) is the official UK Government database of legislation. The website can be searched by title or legislation type. For new users, the site also contains helpful guidance pages to help you navigate your way around.

- Some companies (eg. Greenspace; Croner-I) will track changes in legal requirements and provide monthly updates on how this will affect or impact individual businesses. This bespoke service will often be as part of a paid subscription.
- DEFRA publishes updates and consultations and you can sign up to receive alerts on any upcoming changes – [Department for Environment, Food & Rural Affairs e-alerts](#).

- The following organisations will also provide updates on legislation either on their websites or through subscriptions:
  - [ISEP – The Institute of Sustainability and Environmental Professionals](#)
  - The Ends Report – [Environmental news, analysis, reference – ENDS Report](#)



## Things to watch out for

- Does a supplier promote compliance activities as a successful sustainability achievement?
- Can a supplier provide examples of where their environmental efforts go beyond compliance?

## Examples



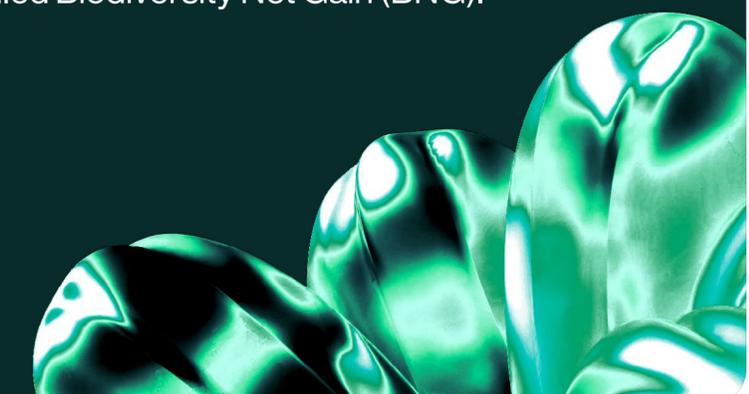
### Good example

A company makes its compliance requirements publicly available – or on request, whilst also demonstrating additional sustainability actions. This includes voluntary ISO 14001 certification, Environmental Policy, Sustainability Strategy, net zero target and evidence of actions taken to date to reduce the company’s environmental impact.



### Bad example

A company which promotes the opening of a new building or site where it has increased biodiversity by 10%. This is a legal planning requirement in most of the UK – all new developments are required to generate a *minimum* of 10% increase in biodiversity, also called Biodiversity Net Gain (BNG).



# Impact throughout lifecycle

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When thinking about a sustainability claim, it's important to think about the relevance of the claim to the product or service throughout its lifecycle.

## What you need to know

- **Lifecycle approach** means looking at the end-to-end environmental impacts of a product or service.
  - It's about thinking about the impacts from extraction, production, use and disposal of a product or service, sometimes referred to as "cradle-to-grave".
  - You don't need to take a scientific approach, although you may find that helpful, but instead, think about the high-level impacts and whether a company is addressing these.
  - Some suppliers can provide data which may help you better understand the different impacts of the product.
  - Suppliers should focus sustainability efforts on areas of **biggest impact**. Advertising claims that relate to low-impact activities are misleading.
- **Sometimes there is no perfect answer.** Environmental impacts of a product or service could include greenhouse gas emissions, plastic use, waste, water use, resource use... and sometimes they can be conflicting.
  - There's no perfect answer, it depends on your priorities. For example, plastic packaging may have a lower carbon footprint but cardboard packaging might be easier to recycle.

## Things to watch out for

- What are the biggest impacts of the product or service throughout its lifecycle?
- Can suppliers provide data about a product throughout the lifecycle, through a Life Cycle Analysis (LCA)?

## Examples

### Good example

A company producing furniture will provide environmental product information detailing considerations for sourcing raw materials, the carbon footprint of the product through procurement, transportation and production and, the percentage of recycled materials used in the products and the recyclability of the product at end of use.

### Bad example

A catering company focusing on packaging without acknowledging the impacts of food sourcing, transportation and waste would suggest a company is not addressing the biggest impact of its service.



# Understanding waste



The different methods of disposal for items can be confusing to consumers, with claims of “biodegradable” and “compostable” often used in ways that risk contributing to greenwashing. The different waste types are broken down in more detail below.

## What are the different kinds of waste?

**Recycling** refers to the process in which materials from items that are no longer needed are transformed into new products.

- Typical recyclable materials include paper, cardboard, certain plastics such as PET or HDPE bottles, metal cans, and glass jars or bottles.
- Recycling generally uses less energy than manufacturing products from raw materials, which helps reduce greenhouse gas emissions and the environmental impact of extracting new resources.
- When possible, choosing items that contain recycled content can help support and strengthen recycling markets.
- Some materials labelled as “recyclable” may only be recyclable through specialist facilities or may not currently be recycled at scale because the process is not commercially viable.

- Composite materials, which combine multiple components, are difficult to recycle because the individual parts must be separated before processing.

**Biodegradable waste** includes any material that is capable of breaking down naturally over time through the activity of microorganisms.

- The speed of decomposition can vary considerably, ranging from a few weeks to many years, depending on the material and environmental conditions.
- Although biodegradable items do eventually break down, they may still leave behind harmful residues such as microplastics.
- The term “biodegradable” is not strictly regulated, which means that products can make this claim without having to meet specific standards or timelines for degradation.

## Waste Hierarchy

Whilst it’s important to look at the end of life of a product when purchasing, it is also worth considering whether the item is really necessary, if volumes can be reduced or if a reusable item can be used instead.

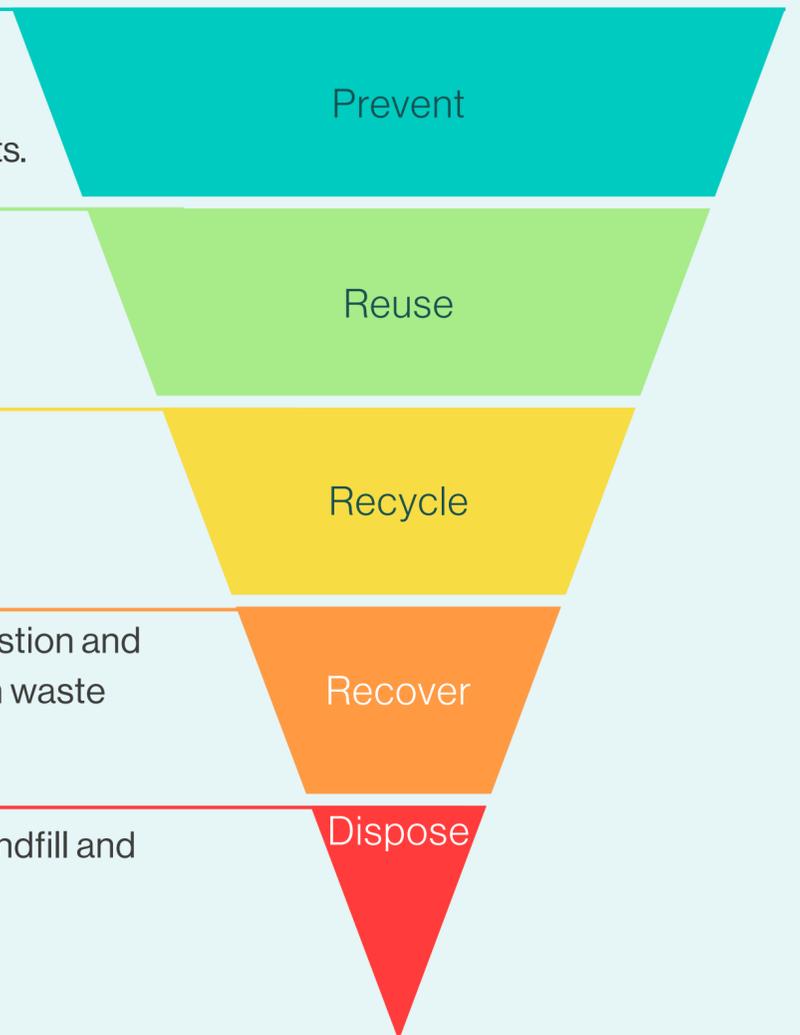
**Prevent:** the best option, avoiding creating waste through less consumption, efficient design and extending the life of existing products.

**Reuse:** clean, repair, recondition, refurbish, lease, borrow and replace spare parts so items can be used again.

**Recycle:** converting waste into a new item or product.

**Recover:** using methods like anaerobic digestion and incineration with energy recovery which turn waste into energy.

**Dispose:** the last resort, sending waste to landfill and incineration without energy recovery.





**Compostable waste** includes materials that break down under specific conditions of heat, moisture, and oxygen to produce nutrient-rich compost.

- To be certified as compostable, materials must decompose within a defined timeframe, typically within 90 days, and must leave no toxic residues behind.
- Common examples of compostable waste include food scraps, garden waste, and some types of bioplastics that have been certified to meet compostability standards.
- Because compostable packaging requires appropriate processing conditions, it is important to ensure that such items have access to an industrial composting facility when they reach the end of their life.
- Due to limited infrastructure and consumer confusion about disposal, many compostable products currently sold in the UK end up in landfill or incineration, which reduces their environmental benefits.

- A frequent misconception is that compostable packaging can be placed in food waste or garden waste bins, but most of these waste streams are not able to process compostable plastics effectively.

#### Home vs Industrial Composting

- Some materials can successfully break down in home composting systems, which operate at lower temperatures and rely on naturally occurring processes.
- Other materials require the higher temperatures and controlled conditions found in industrial composting facilities in order to break down fully and safely.
- Certification labels are available to help consumers identify whether a product is suitable for home composting or requires industrial composting. An overview of these can be found in the [Logo guide](#).

**Incineration with energy recovery** should be used only as a last resort for waste that cannot be reduced, reused, recycled, or composted.

- In this process, waste is transported to an Energy-from-Waste facility where it is burned to generate electricity, steam, or heat.
- This method prevents waste from being sent to landfill, which helps reduce environmental impacts associated with landfill disposal. Burning waste does produce greenhouse gas emissions, though.
- To be officially classified as an energy-recovery operation, an incinerator must obtain R1 status from the Environment Agency.

Read more →

## What about plastics?

### Bioplastics

- The term “bioplastics” covers a wide range of materials and can refer either to biodegradable plastics or to plastics made from plant-based sources.
- Bio-based plastics are produced using materials such as starch, cellulose, or lignin, but they are not necessarily biodegradable.

### Oxo-plastics

- Oxo-plastics are conventional plastics that contain added metal salts designed to speed up their fragmentation when exposed to sunlight and oxygen.
- These plastics have raised concerns because they can increase the presence of microplastics in the environment and can also reduce the quality of recycled materials.
- They are banned in the EU, and the UK supports this position.

### Choosing Appropriate Materials

- The environmental impact of packaging materials depends on how they are used, and in some cases, plastic may be the most effective option.
- For instance, plastic packaging can help reduce food waste and may have a lower carbon footprint than alternatives such as cardboard when used appropriately.

## Examples

### 👍 Good example

A cultural festival operates a reusable cup system: festival-goers pay a £1.50 deposit on their first drink and swap for a fresh cup with every return. After the festival, the cups are cleaned and reused at other events, cutting down on waste from single-use cups. The festival promotes data demonstrating the lower environmental impact of reusable cups. The festival also doesn't allow sales of water bottles and encourages festival-goers bring their own bottles.

### 👎 Bad example

Dog waste bags are advertised as being better for the planet if they're biodegradable or compostable. These bags are made of oxo-biodegradable plastic which requires oxygen to break down and leaves behind microplastics. This is misleading as most dog waste ends up either in incineration or in landfill where there is limited oxygen so would not biodegrade as claimed.

### 📖 Real life example

In 2024 Lavazza Coffee released an ad claiming that their Eco Caps coffee pods offer 'the coffee shop taste in compostable capsules for your home'. The ASA concluded that this was misleading, as consumers would likely assume they were suitable for home composting, when in fact the capsules are certified EN13432 meaning they are only suitable for industrial composting. ([Source](#)).



# Appendix



# Glossary

Introduction

Substance over style

Evidence

Impacts



Term	Definition
<b>Beyond Value Chain Mitigation</b>	Climate mitigation action or investments that fall outside a company's value chain, including activities that avoid or reduce GHG emissions, or remove and store GHGs from the atmosphere. ( <a href="#">Source</a> )
<b>Carbon accounting</b>	Carbon accounting, or greenhouse gas accounting, is the process of quantifying the amount of greenhouse gases (GHGs) produced directly and indirectly from a business's or organisation's activities within a set of boundaries.
<b>Carbon footprint</b>	See carbon accounting. Carbon footprint is not limited to CO <sub>2</sub> but is an overarching term referring to all GHGs.
<b>Carbon neutral</b>	Quantifying GHG emissions emitted into the atmosphere and balancing through offsetting. There is no requirement to reduce emissions to achieve carbon neutrality; it can be done through purchasing offsets. Offset projects which reduce and which remove carbon qualify.
<b>Decarbonisation</b>	The process of stopping or reducing carbon gases, especially carbon dioxide, being released into the atmosphere as the result of a process, for example the burning of fossil fuels.
<b>Environmental Management System</b>	An Environmental Management System (EMS) acts as a framework for an organisation to manage its significant environmental aspects. ISO 14001 is the international standard for EMS and most widely used EMS standard in the world. An EMS helps an organisation to control its environmental aspects, reduce impacts and ensure legal compliance.

<b>GHG emissions</b>	Greenhouse (GHG) gas emissions are gases that absorb and trap heat (i.e. infrared radiation) from the Sun in the Earth's atmosphere. Includes the following gases that are covered by the UNFCCC/ Kyoto Protocol: carbon dioxide (CO <sub>2</sub> ), methane (CH <sub>4</sub> ), nitrous oxide (N <sub>2</sub> O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF <sub>6</sub> ) and nitrogen trifluoride (NF <sub>3</sub> ). These gases are the direct cause of climate change.
<b>GHG Protocol</b>	The GHG Protocol sets the standard for accounting and reporting of emissions.
<b>Greenwashing</b>	Behaviour or activities that make people believe that a company is doing more to protect the environment than it really is, through making vague or misleading claims.
<b>ISSB</b>	The International Sustainability Standards is the standard-setting board creating a global baseline for sustainability reporting. ISSB has created the first sustainability disclosure standards, IFRS S1 and S2.
<b>Net zero</b>	SBTi defines achieving net zero emissions as when "human-caused GHG emissions are balanced by removing the same quantity of emissions from the atmosphere over a specified period of time (IPCC, 2018)." ( <a href="#">Source</a> ). Net zero requires deep emissions cuts of at least 90% before 2050 to align with climate science.



Term	Definition
<b>Neutralisation</b>	Neutralisation “refers to measures that companies take to counterbalance the climate impact of GHG emissions which are impossible to avoid after their net-zero target date. Neutralization involves permanent removal and storage methods of CO <sub>2</sub> from the atmosphere. In order to achieve net-zero, once companies have achieved their long-term target, they must neutralize any residual emissions (usually less than 10% of base year emissions) using permanent carbon removals and storage.” ( <a href="#">Source</a> )
<b>SECR</b>	Streamlined Energy and Carbon Reporting regulation requires qualifying organisations to report annually on energy consumption and associated greenhouse gas emissions (covering scope 1, 2 and mileage from scope 3 only). Qualifying organisations must also provide a narrative on energy efficiency activities during the reporting period.
<b>SCEF</b>	Standardised Carbon Emissions Framework developed by EAUC gives HE institutions a sector-specific approach to carbon accounting based on the GHG Protocol.
<b>Science-based targets</b>	Science-based targets (SBTs) reflect the requirements that latest climate science deem necessary to limit warming to 1.5°C above pre-industrial levels. Short-term SBTs set out GHG reductions needed for 5-10 years; long-term SBTs set out GHG reductions needed to reach net zero by 2050 or before.

<b>Scope 1</b>	All direct GHG emissions, for example natural gas and fuel.
<b>Scope 2</b>	Indirect GHG emissions from the consumption of purchased electricity, heat or steam.
<b>Scope 3</b>	Other indirect emissions (not included in scope 2) that occur in the value chain of the reporting company, including both upstream and downstream emissions. Scope 3 is split into 15 categories.
<b>Strategic Report and Section 172(1) statement</b>	The purpose of the Strategic Report is to inform company shareholders of how directors have performed their duty under section 172 of the Companies Act 2006. This duty requires directors to promote the success of the company for the benefit of its members or shareholders, including in relation to the impact of operations on the community and the environment.
<b>Sustainability</b>	The UN defines sustainability as meeting current needs without limiting our ability to meet future needs.



Term	Definition
<b>Sustainable Development Goals</b>	<p>17 goals which serve as the blueprint to achieve a better and more sustainable future for all.</p> <p>Most relevant for environmental sustainability are:</p> <ul style="list-style-type: none"> <li>• SDG 7 Affordable and Clean Energy;</li> <li>• SDG 12 Responsible Consumption and Production;</li> <li>• SDG 13 Climate Action;</li> <li>• SDG 14 Life Below Water;</li> <li>• SDG 15: Life on Land.</li> </ul>
<b>TCFD</b>	<p>The Task Force on Climate-related Financial Disclosures is a framework for disclosing the impact an organisation has on climate. It covers four areas: governance, strategy, risk management, and metrics and targets. The UK has adopted the TCFD framework and requires certain organisations to make disclosures.</p>
<b>Transition Plan</b>	<p>A Transition Plan outlines how an organisation will adapt to a low-carbon world aligned to the 1.5°C goal of the Paris Agreement. The UK Government consulted on how to mandate credible transition plans for UK-regulated financial institutions and FTSE100 companies in summer 2025 and requirements are not yet final.</p>

**UK SRS S1 & S2** The UK Sustainability Reporting Standards S1 and S2 are based on the ISSB IFRS S1 and S2. The UK SRS are currently in development, with consultation having taken place in summer 2025 and final version expected by the end of 2025. The UK will begin phasing in mandatory reporting aligned to UK SRS from 2026. UK SRS S1 sets out the overall framework for sustainability-related disclosures, such as sustainability risk and opportunities, across material sustainability targets beyond climate such as social and nature-related issues. UK SRS 2 aligns with TCFD.



## Environmental Certifications



**EMAS** (Eco- Management and Audit Scheme) was established by the European Commission through an [EMAS Regulation](#) with the aim of helping organisations enhance their environmental performance, save energy, and optimise resource usage.

An [EMAS register](#) is available for searching and confirming organisations who have successfully achieved the EMAS certification.



The [International Organisation for Standardisation \(ISO\)](#) have developed many international standards, with some specific to environmental sector such as:

- ISO 14001 Environmental Management System
- ISO 50001 Energy Management System
- ISO14064-1 Greenhouse Gases
- ISO14067- Assessing Carbon Footprint of Products
- ISP 20400:2017 Sustainable Procurement

These international standards can be awarded by several accreditation bodies. To verify that an organisation or company holds the correct standard, look for a symbol often at the foot of a homepage which will have the specific standard that the company have achieved.

The nature of their certification can then be checked on the accreditation bodies website and information will be provided on the area of their business that this has been achieved for and when this expires. A key requirement for these standards is continuous improvement so organisations will need to demonstrate this as part of their reassessment every couple of years.



Certified **B Corporations**, or B Corps, are companies verified by B Lab to meet high standards of social and environmental performance, transparency and accountability.



The **Planet Mark** provides businesses with the opportunities to achieve certifications in net zero, the built environment and social value inspiring them to take meaningful action and generate long-term business value.



The **Carbon Trust** provides support to businesses on their journey to achieving net zero. They provide assurance and businesses can be assessed against key standards.



## Catering standards



The **Red Tractor** symbol on food products means that it has been responsibly sourced, safely produced and comes from crops and animals that have met welfare, food safety and environmental protection. All Red Tractor produce is traceable back to UK assured farms.



Products displaying the '**RSPCA Assured**' logo must have met relevant animal welfare standards.



The **Fairtrade Foundation** works to improve the terms of trade by securing fairer prices, and setting rigorous standards across the supply chain.

Products bearing this mark have met the internationally agreed social, environmental and economic Fairtrade Standards.



The Sustainable Restaurant Association has established a '**Food Made Good**' standard which sets a framework for assessing caterers and their supply chain on sourcing, society and the environment.

Organisations are assessed and if successful given a rating of either 1, 2 or 3 stars. Organisations would need to be reassessed against these standards every couple of years so ask for clarification on when this rating was awarded.



The **Soil Association** works with caterers, schools, and communities and supports businesses to implement sustainable practices across the food system through establishment of standards and the sharing of best practice across the sectors.



The **Rainforest Alliance** (RA) aim to create a more sustainable world by using social and market forces to protect nature and improve the lives of farmers and forest communities.

The RA launched their Sustainable Agriculture Standard in 2021 to drive more sustainable agricultural production and responsible supply chains.



The Marine Stewardship Council (**MSC**) has a blue MSC ecolabel which can only be applied to wild fish or seafood products from fisheries that have been certified to the MSC Standard. The MSC have developed a Chain of Custody Standard for supply chain businesses which ensures MSC certified fish and seafood is separated from that which is non-certified and is clearly labelled.



The Linking Environment and Farming (**LEAF**) organisation aim to promote a vision for a global farming and food system that delivers Climate Positive action, builds resilience and supports the health, diversity and enrichment of food, farms, the environment and society.



## Construction standards (sustainability)



A **BREEAM** (Building Research Establishment Environmental Assessment Method) assessment sets and measures sustainability performance of buildings, ensuring that projects meet sustainability goals and that these continue to perform optimally over time.

Projects such as construction, refurbishment and fit-out are assessed and if successful are awarded a rating with the highest being 'Outstanding'.



**LEED** (Leadership in Energy and Environmental Design) also sets standards for sustainable buildings and was developed by the U.S. Green Building Council.

It reviews the environmental merit of office maintenance, construction and design.



A **SKA** assessment is used to evaluate the environmental impact of your office or higher education fit out. This particular assessment is unique because it doesn't include areas outside your project scope.



The **International Well Building Standard** takes a holistic approach to the built environment by setting standards for measuring, certifying and monitoring features that impact human health and wellbeing.

## Energy efficient products



From 1st March 2021, the European Commission updated the energy labels for products such as dishwashers, washing machines, fridges and the A-G ratings provide guidance on efficiency.



Products that are awarded an **Energy Star** label meet strict energy-efficiency specifications set by the U.S Environmental Protection Agency.



## Materials/Packaging

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The **FSC** (Forestry Stewardship Council) is a non-profit organisation aiming to protect the world's forests by promoting strong environmental and economically viable management of them.

Look for the 'tick-tree' logo on products when procuring wood or paper.

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## Supplier engagement

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**Sedex** is a technology company supporting supply chain sustainability. They own the SMETA audit and methodology which is an on-site assessment to help organisations to understand the standards of labour, health and safety, environmental performance and ethics in their supply chains.

Sedex and SMETA are not certifications themselves, but provide the tools that organisations can use to improve social, ethical and environmental concerns in the supply chain.

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**EcoVadis** is a platform which assesses and rates organisations' performance across environmental, labour and human rights, ethics and sustainable procurement. Organisations who participate in EcoVadis' assessment are scored and awarded medals (bronze, silver, gold and platinum) based on their performance against the EcoVadis methodology.

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## Home Compostable (generally below 55C)



Ok Compost label issued by TUV Austria, NF T51-800/AS 5810.



DIN Geprüft logo certified by TUV Rheinland via DIN CERTCO, NF T51-800/AS 5810.



Compostable Materials Certification Scheme (CMCS) UK. Certified by DIN and TUV, NF T51-800/AS 5810.

## Industrial Compostable (generally over 55C)



Ok Compost label issued by TUV Austria, NF T51-800/AS 5810.



DIN Geprüft logo certified by TUV Rheinland via DIN CERTCO, NF T51-800/AS 5810.



Compostable Materials Certification Scheme (CMCS) UK. Certified by DIN and TUV, NF T51-800/AS 5810.



Seedling logo, widely recognised. Owned by European Bioplastics and certified by TUV Austria and DIN CERTCO, EN13432. Applies to industrial composting only. The European Standard for industrial compostable packaging is EN13432 which sets a requirement for the decomposition time and ecological requirements.



The Ends Report – [Environmental news, analysis, reference | ENDS Report](#)

ISEP – [The Institute of Sustainability and Environmental Professionals](#)

[Oxford Offsetting Principles](#)

UK Government [Green Claims Code](#)

UK Government [Legislation](#)

UK Government [Making environmental claims on goods and services](#)

UK Government [Home page – Green claims code](#)

WWF [Guide to Greenwashing](#)

WRAP [Considerations for Compostable packaging](#)

# South Ken ZEN+ Supply Chain Charter reference



This Greenwashing Guide cross-references the South Ken ZEN+ Supply Chain Charter. The table below shows how each section of the guide aligns with the relevant principles and commitments set out in the Charter. The Charter can be read in full [here](#).

## Understanding Net Zero

**S1.1** be working towards reducing their emissions to net-zero (ideally through the use of Carbon Reduction Plans);

**S1.2** work towards setting science-based net-zero targets in line with the Paris Agreement.

## Understanding Offsetting

**S1.1** be working towards reducing their emissions to net-zero (ideally through the use of Carbon Reduction Plans);

**S1.2** work towards setting science-based net-zero targets in line with the Paris Agreement;

**S1.4** work with us to develop and offer innovative solutions that support our South Ken ZEN+ ambitions.

## Think about the bigger picture

**S1.1** be working towards reducing their emissions to net-zero (ideally through the use of Carbon Reduction Plans);

**S1.2** work towards setting science-based net-zero targets in line with the Paris Agreement;

**S1.3** share their carbon footprints (Scope 1, 2 and preferably Scope 3 greenhouse gas emissions on request), demonstrate progress and share successes;

**S1.5** adopt sound environmental management practices and align with recognised standards (such as ISO 14001, B-Corp Status, ISO 20400 etc).

**S3.2** provide products that can be reused, refurbished, repaired or recycled as many times as possible to keep them at their highest value in support of the principles of a Circular Economy;

**S3.4** include sustainability criteria on the assessment and selection of their own suppliers, where material and proportionate to do so.

## Beyond the bare minimum

**S1.1** be working towards reducing their emissions to net-zero (ideally through the use of Carbon Reduction Plans);

**S1.2** work towards setting science-based net-zero targets in line with the Paris Agreement;

**S1.3** share their carbon footprints (Scope 1, 2 and preferably Scope 3 greenhouse gas emissions on request), demonstrate progress and share successes;

**S1.4** work with us to develop and offer innovative solutions that support our South Ken ZEN+ ambitions;

**S1.5** adopt sound environmental management practices and align with recognised standards (such as ISO 14001, B-Corp Status, ISO 20400 etc). Larger Suppliers are expected to report on progress against their Carbon Reduction Plans demonstrating progress towards their goals.



### Impact throughout lifecycle

**S1.1** be working towards reducing their emissions to net-zero (ideally through the use of Carbon Reduction Plans);

**S1.2** work towards setting science-based net-zero targets in line with the Paris Agreement;

**S1.3** share their carbon footprints (Scope 1, 2 and preferably Scope 3 greenhouse gas emissions on request), demonstrate progress and share successes;

**S1.4** work with us to develop and offer innovative solutions that support our South Ken ZEN+ ambitions;

**S3.2** provide products that can be reused, refurbished, repaired or recycled as many times as possible to keep them at their highest value in support of the principles of a Circular Economy.

**S3.4** include sustainability criteria on the assessment and selection of their own suppliers, where material and proportionate to do so;

**S5.1** use low-carbon deliveries where possible, and explore creative and innovative solutions to consolidating deliveries;

**S5.2** bring their proven experience and expertise to work with us to reduce traffic to our sites through logistics consolidation;

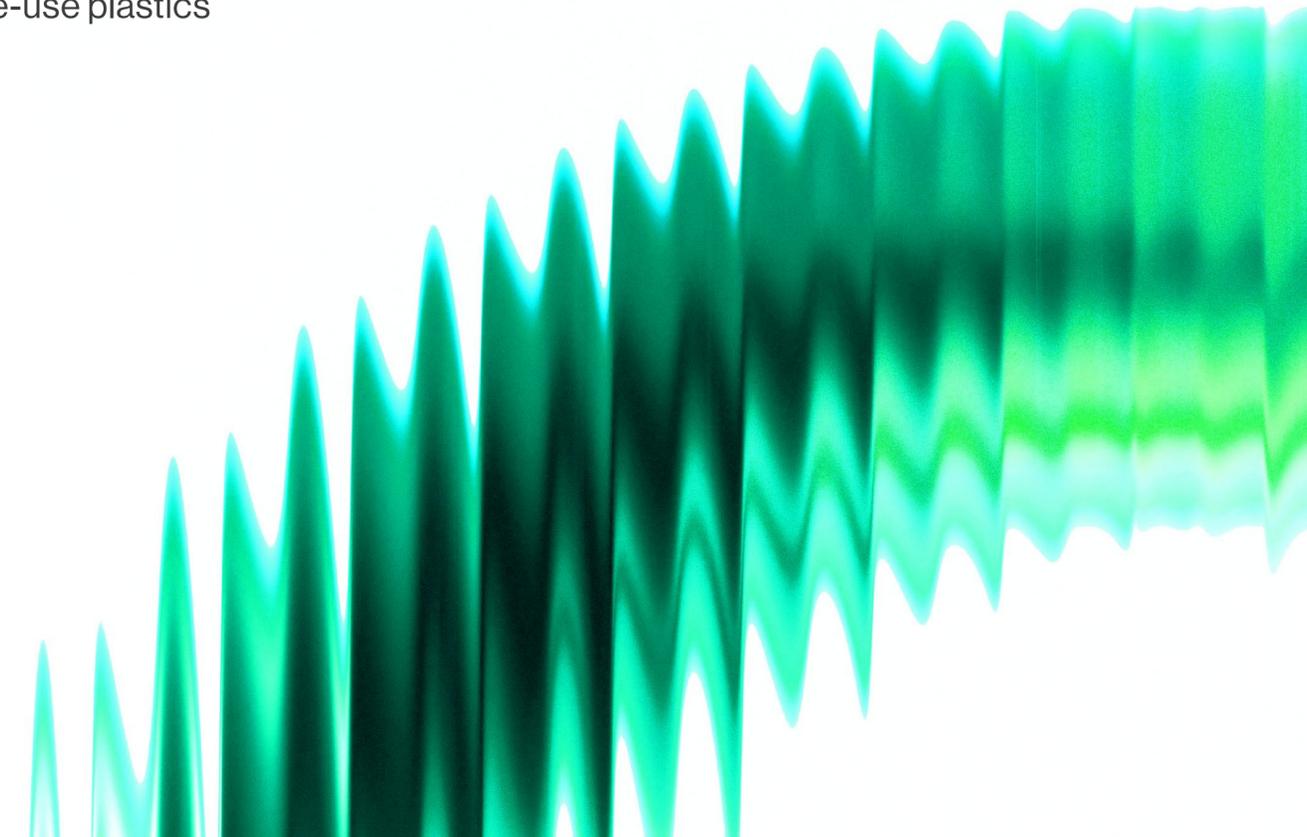
**S5.3** strive to increase the number of low emission vehicles in their fleet or through their logistics providers.

### Understanding waste

**S3.1** demonstrate robust application of the waste hierarchy in the delivery of goods and services to our organisations, ensuring minimal waste to landfill;

**S3.2** provide products that can be reused, refurbished, repaired or recycled as many times as possible to keep them at their highest value in support of the principles of a Circular Economy;

**S3.3** work with us in eradicating unnecessary consumer single-use plastics, and minimise the use of single-use plastics where unavoidable.



# SOUTH KEN ZEN+

## About South Ken ZEN+

Started in 2022, South Kensington Zero Emissions (ZE) Nature Positive (N+) is a collaboration between 22 world-leading arts, science and cultural institutions who have come together to amplify and accelerate our collective response to the planet's increasingly urgent climate and biodiversity crisis. Through collaboration, knowledge-sharing and economies of scale, we aim to lead by example and create a ripple effect that inspires action across the world.

For queries regarding the *Sustainable Purchasing: How to Spot Greenwashing* or the *South Ken ZEN+ Supply Chain Charter*, contact us via [www.southkenzen.org](http://www.southkenzen.org).

## This Guide was written in 2026 by the following members of the South Ken ZEN+ Programme:

### Abigail Green

Royal Albert Hall

### Leah Thomas

Historic Royal Palaces

### Jen Stone

History Royal Palaces

### Will Gee

Imperial

### Megan Jones

Royal College of Art

### Tiva Montalbano

South Ken ZEN+

### Kimberley Lewis

Natural History Museum



IMPERIAL

