Canadian Consumer Perceptions of

SUSTAINABLE FASHION & GREENWASHING

FASHION TAKES ACTION FTA

FASHION TAKES ACTION

Fashion Takes Action (FTA) is Canada’s non-profit fashion industry organization focused on sustainability. We work with industry and consumers in an effort to shift behaviour toward more positive social and environmental impacts. Our mission is to advance sustainability in the entire fashion system through education, awareness, research and collaboration.

OUR GUIDING PRINCIPLES

FTA operates internally, externally and determines formal relationships with these Guiding Principles in mind.

FTA is:

- Transparent
- Innovative
- Motivational
- Economical
- Inclusive

Written by: Document reference (please use this reference when citing FTA’s work): Fashion Takes Action, 2024, Consumer Perception of Sustainable Fashion & Greenwashing, by Kelly Drennan, Sabine Weber, Olaf Weber, Rebekah Stokes.

Project Management: Kelly Drennan, Founding Executive Director, Fashion Takes Action. For questions or inquiries contact info@fashiontakesaction.com.



Photo Candace Cosentino, Installation (Weber et al., 2024)

THE RESEARCH TEAM



Kelly Drennan is the award-winning founding executive director of Fashion Takes Action. A systems thinker and disruptor, she has been dedicated to transforming the entire fashion system since founding the organization in 2007. Passionate about collaboration, Kelly has convened a number of multi-stakeholder initiatives, most recently the Canadian Circular Textiles Consortium (CCTC). She co-authored Canada's textile recycling feasibility report and led a pilot program for mechanical recycling, resulting in a consumer-facing product.

Kelly also founded the WEAR Conference in 2014, which motivated hundreds of industry experts until its last event in 2023. She now produces a Textiles & Apparel track for the Canadian Circular Economy Summit and has delivered numerous presentations, including a TED talk on climate action. The youth education program she developed, My Clothes My World, has reached over 35,000 students across Canada since 2014, and she aims to expand it internationally. As a member of the UNESCO Greening Education Partnership, she positions fashion as a tool for youth engagement in climate issues.



Dr. Sabine Weber has nearly two decades of experience in Europe's fashion industry as a product manager, head of design, and international buyer before moving to Canada. She completed her PhD at the University of Waterloo in 2021, focusing on Social Innovation and transitioning fashion towards sustainability. Since 2017, Sabine has been a faculty member at Seneca Polytechnic. Her research centres on textile waste, recycling, greenwashing, and sustainable consumption, with publications in high-impact journals such as Resources, Conservation, and Recycling and the International Journal of Consumer Studies.

She has also curated exhibitions including Dumpster Dive and Sustainable Fashion, to highlight innovative approaches to sustainability in fashion. With Kelly, Sabine co-convened the Ontario Textile Diversion Collaborative, and remains a key participant in the Canadian Circular Textiles Consortium (CCTC). In recognition of her contributions, she received the Women of Inspiration™ Award in 2020 and the University of Waterloo Alumni Inspiration Award in 2024.

THE RESEARCH TEAM



Dr. Olaf Weber is a Professor at the Schulich School of Business where he holds the CIBC Chair in Sustainable Finance. He is a Senior Fellow of CIGI and an adjunct professor at the School of Environment, Enterprise and Development (SEED) at the University of Waterloo.

His research and teaching interests address the connection between financial sector players, such as banks and sustainable development and the link between sustainability and financial performance of enterprises. His research focus is on the impacts of the financial industry on sustainable development, the role of voluntary and regulatory mechanisms for the financial sector to become more sustainable, social banking and impact investing, the materiality of sustainability risks and opportunities for investors and artificial intelligence as a tool to analyse environmental, social, and governance (ESG) performance.



Rebekah Stokes is the former Program Coordinator at FTA. A circular economy advocate with a background in global development, her passion lies in creating real-world solutions to complex issues. She works to pivot current systems towards a more just and sustainable future. Rebekah has applied her knowledge and skills in various projects, including research, content creation and outreach initiatives.

Her passion for fashion was born out of a love for its storytelling capability and through her work in the sustainable fashion sphere, she seeks to advance more stories of justice and equity in the clothes we wear.

EXECUTIVE SUMMARY

As the climate crisis develops and awareness of international humanitarian injustices grows, consumers are increasingly presented with evidence of the adverse effects of their product choices and consumption habits. These same consumers ask for greater sustainability from the brands they purchase from, including clothing companies.

Fashion Takes Action (FTA) conducted a comprehensive survey of 2000 Canadian consumers to gain insight into their attitudes and behaviours toward sustainable fashion and greenwashing. Sustainable fashion entails environmentally and ethically responsible design and production, and factors in consumer behaviour through purchase, use and disposal. Sustainable fashion companies aim to preserve resources, avoid environmental harm, and foster human well-being, aligning with the United Nations' Sustainable Development Goals. The practice of greenwashing is when companies either conceal negative environmental practices while emphasizing positive ones, or make entirely false and unverified claims. Industry experts associate it with terms like "misleading" and "exaggeration," where sustainability is used for marketing purposes rather than for genuine environmental improvement.

The survey revealed that most respondents expressed concern about environmental issues, with more than a quarter being extremely concerned, and that there is a desire to live more sustainably. However, only about half of participants know about the fashion industry's negative impacts. Despite sustainable fashion no longer being niche, our survey demonstrates a low recognition of the terms sustainable, or eco-friendly clothing, which raises questions about the availability, labelling, and consumer awareness of these clothing options.

In the aftermath of the pandemic, comfort is the top criterion for clothing selection, followed by price, fit and style. Participants prioritize the physical requirements of garments first and then evaluate sustainability afterwards. The fair treatment of workers was considered important by two thirds of participants, while environmental impact was only important to a quarter of those surveyed.

Participants actively reduce their fashion footprint through practices such as repairing clothes and are striving in other ways to minimize their impact. However, many lack guidance on where to start, highlighting a need for consumer education. Common actions include washing clothes in cold water and donating unwanted garments, with younger participants also reselling or swapping clothing.

The majority of participants were not familiar with the term 'greenwashing', with no difference between French and English Canadians, yet higher education levels correlated with greater familiarity. After we defined greenwashing, half of the participants considered

it a serious issue, particularly in food, personal care products, home care products, clothes, and automobiles.

After participants learned what greenwashing is and how brands practice it, participants said they occasionally see a variety of greenwashing claims. Most participants have never purchased garments promoted with greenwashing claims, but some have done so occasionally. Social media and advertising campaigns are perceived as major sources of greenwashing in clothing, followed by in-store signage and marketing by global brands, online stores, fast fashion retailers, and various other types of retailers. Participants view Canadian-owned boutiques, sustainable merchandise stores, and vintage stores as less likely to engage in greenwashing practices.

Before we provided participants with some real-life examples of greenwashing, we aimed to first understand how they validate sustainability claims in fashion. Participants predominantly rely on reading garment labels for fibre content, and the country of origin. However, fabric composition alone doesn't indicate sustainability impacts, necessitating third-party certifications like Fair Trade or Global Organic Textile Standard (GOTS) to validate ethical and sustainable production practices.

Almost half of participants stated greenwashing is difficult to spot, yet those who reported that it is easy to identify were the ones who struggled the most with our examples. Concerningly, our results indicate that many consumers trust “circular,” “sustainably sourced,” or “conscious collection” buzzwords, and do not recognize these as greenwashing.

Participants were informed about the prevalence of greenwashing and were asked how they would respond if they discovered their favourite clothing brand engaged in it. Most said they would reduce or stop buying from the company, highlighting consumer sensitivity to greenwashing. Additionally, a quarter would discourage others from buying, and some would voice concerns on social media. Other actions include reporting to regulatory bodies, environmental NGOs, or directly to the brand. These findings underscore that greenwashing can lead to consumer backlash and reputational damage for brands.

Generally, participants strongly agreed that clothing brands need to earn and maintain their trust in order to demonstrate that they, or their products, are sustainable. Additionally, they believe that legislation should be enacted by the government to prevent greenwashing. As awareness around greenwashing grows, brands need to be aware of the reputational risks associated with greenwashing practices. While many participants did not say they would take action against a greenwashing brand, more than a third would buy fewer products or stop buying altogether.

Our research reveals that consumers are motivated to pursue sustainability in both their shopping habits and in their lifestyles. However, the ultra-prevalence of greenwashing in the clothing industry makes consumers’ pursuit exceedingly more difficult. This report aims to better capture the key factors Canadian consumers consider when shopping, and identify specific areas to target when addressing greenwashing.

In conclusion, the report offers valuable insights into consumer perceptions and shopping behaviours regarding sustainable fashion, while emphasizing the need for continued efforts to promote sustainable practices. The report highlights low consumer awareness and the vulnerability of being a victim of greenwashing. The concerns about greenwashing emphasize the need for increased education, transparency, and regulatory measures to protect consumers. Brands must prioritize earning and maintaining consumer trust through honest communication and adherence to recognized standards. Finally, the government is critical in guiding industry practices and enforcing regulations to combat greenwashing effectively.



Photo Candace Cosentino, Installation (Weber et al., 2024)

TABLE OF CONTENTS

Fashion Takes Action 02
- Our guiding principles 02

The Research Team 03

Executive Summary 05

Contents 08
- List of figures 09
- List of tables 10
- List of focus topics 11
- Acknowledgements 12

Why This Study Matters & How to Use It 13

Research Methodology 15
- Expert voices in this study 16
- Questions That Guided Our Study 18
- Who We Surveyed 25

Sustainability or Greenwashing? The Blurred Lines in Fashion 30
- The Roots of Greenwashing 34
- Greenwashing in the Fashion Industry 37
- Fashion's Greenwashing Crisis 39
- Measuring Environmental Concern 41
- Sustainable Living: A Closer Look 42

Part 1 Consumer Awareness & Action 43
- What Consumers Know About Fashion's Impact 43
- Eco vs Sustainable: Do Labels Shape Consumer Choices? 46
- Fashion Buying Decisions: What Matters Most? 49
- What Drives Clothing Purchases? 51

Part 2 Consumer Impact Reduction 52
- Minimizing Fashion's Footprint 52
- Fashion & The Circular Economy 53

Part 3 Is Greenwashing Recognizable? 59
- Greenwashing: A Serious Issue Few Can Name 59
- Understanding the Prevalence of Greenwashing Claims 61
- Are Consumers Falling for Greenwashing? 63
- Greenwashing Culprits 64
- Verifying Sustainability Claims 66
- Do Consumers Look for Sustainability Certifications? 68
- Understanding Sustainability Certifications in Fashion 69

Part 4 Identifying Greenwashing in Fashion 71
- Example 1: Circular Swimwear 72
- Example 2: Denim Goes Natural 73
- Example 3: Sustainably Sourced 74
- Example 4: Conscious Collection Garment Conserves Water 75
- Example 5: Wool Coat 76
- Example 6: Certified Recycled Nylon Pants 77
- Example 7: Organic Cotton 78
- Example 8: Biodegradable Polyester 79
- Example 9: Sustainable + Vegan 80
- Example 10: Shop and Save the Planet 81

Part 5 Consumer Reactions to Greenwashing 85
- Who Do Consumers Trust? 87
- How Can Fashion Brands Earn & Maintain Trust? 88
- Experts Speak: How to Solve Greenwashing 91
- Government's Role: Awareness of Greenwashing Regulations 93

Key Insights & Implications 95

Greenwashing Policy Landscape 98
- Canadian Greenwashing Legislation 99
- Global Greenwashing Legislation 102
- Key Takeaways & Insights 114

Recommendations for The Competition Bureau 115
- Strengthening Greenwashing Policies: Final Recommendations 125

References 126

Appendices 131

LIST OF FIGURES

Figure 1: Age Groups of Sample in Comparison to the Canadian Population 26

Figure 2: Number of People in Household 27

Figure 3: Word Cloud of terms used to describe greenwashing by industry experts 32

Figure 4: Environmental concerns 41

Figure 5: Description of sustainable lifestyle 42

Figure 6: Survey Infonode: Facts Presented in the Survey 43

Figure 7: Have people seen and bought clothing described as eco-friendly or sustainable? 46

Figure 8: How consumers describe sustainable fashion 47

Figure 9: Reasons for buying eco-friendly and sustainable clothing 48

Figure 10: Consumer priorities when shopping for clothes 49

Figure 11: Influential factors in clothing purchase 51

Figure 12: Efforts to reduce the impact of clothing 52

Figure 13: Frequency of Actions Taken to Reduce Environmental Impact 53

Figure 14: Pathways for Unwanted Clothing 54

Figure 15: Frequency of donating unwanted clothes 55

Figure 16: Familiarity with the term greenwashing 59

Figure 17: Greenwashing is a serious issue 59

Figure 18: The degree to which greenwashing bothers participants 60

Figure 19: How often consumers encounter greenwashing tactics 62

Figure 20: Buying clothing advertised with some environmental claim 63

Figure 21: Perceived likelihood of greenwashing 64

Figure 22: How Difficult is it to Identify Greenwashing in Fashion? 71

Figure 23: Example 1, Circular Swimwear 72

Figure 24: Example 2, Denim Goes Natural 73

Figure 25: Example 3, Sustainably Sourced 74

Figure 26: Example 4, Conscious Collection Conserves Water 75

Figure 27: Example 5, Composition Label 76

Figure 28: Example 6, Recycled Content 77

Figure 29: Example 7, 100% Organic Cotton 78

Figure 30: Example 8, Biodegradable Polyester Gloves 79

Figure 31: Example 9, Sustainable + Vegan 80

Figure 32: Example 10, Shop and Save the Planet! 81

Figure 33: How clothing brands should demonstrate that they act sustainably to earn and maintain consumer trust 86

Figure 34: Government's role in protecting Canadians from greenwashing in fashion 93

Figure 35: Overview of the EU's Greenwashing Legislation 108

Figure 36: T-shirt with twisted side seams 122

LIST OF TABLES

Table 1: Working status of participants 27

Table 2: Household income before tax 28

Table 3: Heritage of Participants 28

Table 4: Participants living on - off-reserve 29

Table 5: The Seven Sins of Greenwashing 36

Table 6: Reactions to fashion industry facts 44

Table 7: What consumers believe happens to donated clothing 45

Table 8: List of greenwashing claims 61

Table 9: Tactics to validate sustainability 66

Table 10: Sought Certification Symbols on Clothing 68

Table 11: Recognition and Purchase of Sustainability Certifications in Fashion 70

Table 12: Consumer responses to greenwashing 85

Table 13: Perceived trustworthiness of different stakeholders 87

LIST OF FOCUS TOPICS *(IN FOCUS)*

In Focus: Terminology Associated with Greenwashing 33

In Focus: Indigenous Perspectives on Sustainable Fashion 56

In Focus: Tackling Microfibre Waste 57

In Focus: The Online Shopping Myth: A Hidden Environmental Toll 58

In Focus: Greenwashing on the Rise 65

In Focus: Is Recycled Polyester Greenwashing? 83

In Focus: Biodegradable vs Compostable 84

In Focus: From Greenwashing to Genuine: How Brands Build Trust 89

ACKNOWLEDGEMENTS

"Fashion Takes Action has received funding from Innovation, Science and Economic Development Canada's Contributions Program for Non-profit Consumer and Voluntary Organizations to conduct this study. The views expressed in this report are not necessarily those of Innovation, Science and Economic Development Canada or of the Government of Canada."

We want to offer our sincere gratitude to the following people for their contributions to this project:

- ***Alexandra Ho**, former FTA Research Assistant*
- ***Ashlee Froese,** branding & fashion lawyer and trademark agent, Froese Law*
- ***Dr. A Wren Montgomery,** Associate Professor, Sustainability & General Management, Ivey Business School*
- ***Ellen Karp,** Global Consumer Strategist, CEO, Anerca*
- ***Elisabeth de Gramont,** Chief Brand Officer, Frank and Oak*
- ***George Harding Rolls,** Campaign Lead, Action Speaks Louder*
- ***Linda Wegelin,** Group Chief Commercial Officer - TESTEX AG*
- ***Myriam Laroche,** Apparel & Textile Sustainability Strategist & Co-Founder, Collective Détour*
- ***Rachel Kitchin,** Senior Corporate Climate Campaigner, Fashion & I.T., Stand Earth*
- ***Sage Paul,** Executive & Artistic Director, Indigenous Fashion Arts*
- ***Audrey Henderson,** FTA Communications Specialist*

WHY THIS STUDY MATTERS & HOW TO USE IT

In 2007, I founded the non-profit organization Fashion Takes Action (FTA) with the mission of advancing sustainability across the fashion industry. Our goal has been to remove barriers through education, awareness, research, and collaboration. Over the years, we have successfully launched numerous initiatives, including our youth education program, My Clothes My World (2014), aimed at students aged 8-18. In our 17 years of operation, we have organized hundreds of events for consumers, including our annual ReMode event, where attendees learn strategies for extending the life of their clothes and exploring secondhand or upcycled fashion. Through our annual WEAR conference, which started in 2014, we have supported industry stakeholders committed to becoming more circular, ethical, and sustainable. Currently, we are also producing the Textiles & Apparel track at the Canadian Circular Economy Summit.

While it may have seemed “early” to launch FTA back in 2007, the past five years have seen a significant increase in awareness around fashion sustainability. Recognizing this shift, we felt it was the right time to evaluate Canadian consumers' understanding, perceptions, and actions related to sustainable fashion. For us, working in sustainable fashion is the norm, but we wondered: Are consumers able to identify sustainable or eco-friendly fashion? Are they purchasing clothing that is genuinely sustainable, or are they being misled by marketing?

While many companies, such as Deloitte, Globescan and PriceWaterhouseCoopers (PWC), have conducted research on consumer attitudes toward sustainable shopping, our study uniquely focuses on sustainable *fashion*. This research project aims to fill a crucial gap and provide new insights into the current state of sustainable fashion in Canada.

Despite some progress, the fashion industry still has a substantial environmental footprint, and change is occurring at an insufficient pace to meet global decarbonization targets and the United Nations’ Sustainable Development Goals (SDGs). These 17 goals, adopted by all United Nations Member States in 2015, provide a shared blueprint for peace and prosperity for people and the planet through the 2030 Agenda for Sustainable Development. Globally, the fashion industry continues to deplete vast amounts of natural resources—including oil, fibre, water, and energy—while generating staggering quantities of textile waste, undermining progress toward these goals.

If the industry maintains its current trajectory, it could account for over 26% of the global carbon budget by 2050 (Ellen MacArthur Foundation, 2017). Meanwhile, consumers are increasingly aware of climate change and are eager to make healthier, more sustainable choices. However, this desire also exposes them to the risk of "greenwashing," where companies falsely portray their products and practices as environmentally friendly.

Greenwashing is not a new phenomenon, but the urgency around it has intensified as claims proliferate in both fashion retail and product offerings. We sought to understand whether Canadian

consumers trust fashion brands, what their perceptions of greenwashing are, and whether they can effectively recognize it in the industry.

THERE ARE MULTIPLE WAYS TO READ THIS REPORT.

To acknowledge the diverse stakeholders who will benefit from this report—ranging from high school students and fashion brands to sustainability professionals, academics, government, and any consumer interested in sustainable fashion—we have created multiple options for engaging with the content.

At the outset of this research project, we formulated key questions we aimed to answer. We have listed these questions below, providing brief responses along with links to the corresponding sections in the report for readers with limited time who are primarily interested in quick answers. Additionally, those seeking a concise overview can refer to our Executive Summary, which highlights the main findings.

For readers eager to delve deeper into the study, we conducted a comprehensive literature review. Instead of placing it at the beginning of the report, we've segmented the literature review and integrated relevant insights throughout various sections. For instance, key definitions related to sustainable fashion and greenwashing can be found in the “Introduction” section, highlighted in green for easy identification. Other portions of the literature review appear in sections such as “The History of Greenwashing” and “Greenwashing in the Industry.” To enhance context and relevance, we also included insights from industry experts regarding their definitions of greenwashing, along with an overview of the "7 Sins of Greenwashing" and real-world examples from the fashion sector.

Moreover, we have included multiple focused topics throughout the report, such as “Terms Used in Parallel to Greenwashing.” These segments, derived from our literature review, are explicitly highlighted for easy recognition and further information.

Another special section is on Indigenous consumers, which are often overlooked in research about Canadian consumption behaviour.

Our conclusion offers a comprehensive overview, summarizing the key insights to encourage readers to reflect on the overall message and significance of this document. Following the conclusion, we present an outline of current greenwashing legislation in Canada and other countries, along with actionable recommendations to stimulate discussion on greenwashing and support the development of effective legislative measures.

We hope that our report is a meaningful read for all stakeholders and answers the most urgent questions about sustainable fashion and greenwashing.

Happy reading,

Kelly Drennan

Kelly Drennan
Founder of Fashion Takes Action

RESEARCH METHODOLOGY

Literature Review: To answer our research questions, we conducted a literature review on sustainable fashion and greenwashing in the fashion industry. This helped to identify information that has already been published, see which research questions could already be answered, and create relevant survey questions. To find the literature for the lit review, we used Google Scholar and Scopus to search publications related to sustainable fashion and fashion greenwashing.

Online Survey: We developed a comprehensive online survey, which took about 25 – 30 min for participants to complete and fielded it in both English and French during October/November 2023 through Logit Group, a professional Canadian survey fielding company. Logit is a member of ESOMAR & the Canadian Research Insights Council (CRIC) and meets all standards, ethics and best practices laid out by the organization. The survey received ethical approval from Seneca Polytechnic and York University. In total, we collected 2000 consumer responses including participants aged 15+, Indigenous peoples, 500 French responses and all income levels and demographics. Data was analyzed using descriptive and parametric statistical methods, such as mean, Pearson correlation, t-tests, and ANOVAs. Appendix A is the survey.

Store Checks: We made three brick-and-mortar store visits (Ottawa, Toronto and London), and we examined fifty online fashion stores to look for real-world examples of greenwashing. We took photos and screenshots to discuss the examples and analyzed them to present a variety of greenwashing ‘sins’. Before using the examples for our online survey, we asked a graphic designer to modify them by removing all brand labels and identifying brand information.

Expert Interviews: To gain deeper insights following our analysis of the quantitative survey findings, we conducted hour-long, semi-structured Expert Interviews with subject-matter experts from various stakeholder communities. Held between March and August 2024, these interviews involved eight experts, both in English and French, each contributing unique perspectives, as outlined in the bios below. We opted for in-depth Expert Interviews to enrich our quantitative analysis and refine our recommendations. This approach engages thought leaders in meaningful discussions, either at the beginning of a project or at critical junctures. By conducting these interviews after the quantitative analysis, we were able to share our findings with the experts and incorporate their interpretations of the data into our conclusions.

Discussions focused on three main areas:

- The experts’ perceptions and views on greenwashing, both generally and in fashion
- Their reactions to and interpretation of the quantitative research findings
- Their perspectives on possible ‘solutions’ or recommendations.

The discussion protocols were prepared by qualitative specialist Ellen Karp of Anerca International, and the interviews themselves were conducted by Ellen Karp and Kelly Drennan. Sessions were recorded (with participants’ permission) and transcribed for analysis. Findings from the interviews were then integrated into the overall analysis and reporting for the project. Additionally, sample

quotations from the interviews appear within quotation marks in the report, again with the permission of the interviewee.

EXPERT VOICES IN THIS STUDY

Ashlee Froese, branding & fashion lawyer, trademark agent, Froese Law

Ashlee Froese is an award winning branding & fashion lawyer and trademark agent. She has been practicing law since 2007. She is recognized by the Law Society of Ontario as a Certified Specialist in Trademarks Law, and is 1 of 6 female lawyers to carry that designation. Since 2017, Ashlee is consistently listed in the World Trademark Review as one of the top 1000 trademark lawyers in the world. Prior to launching Froese Law, Ashlee was a partner on Bay Street. She fast tracked to partnership within 6 years. Ashlee's scope of practice includes trademarks, copyright, contract, licensing, domain name, social media, marketing/advertising, packaging/labelling, ESG and start-up corporate laws.

Dr. A Wren Montgomery, Associate Professor of Management & Sustainability and JJ Wettlaufer Faculty Fellow at the Ivey Business School, Western University and Faculty Affiliate at the University of Michigan's Erb Institute for Sustainable Enterprise

Dr. Montgomery's research on firm environmental communications has been pivotal in defining greenwash and its tactics, and informing strategies to stop it. Her research has been featured in top academic journals and in prominent media outlets, such as The Globe and Mail, The Guardian, CBC Marketplace, CBC News, Bloomberg News, and The Washington Post among others. In 2023, Wren co-founded the Greenwash Action Lab to make academic research and insights accessible to policymakers, NGOs, and managers leading anti-greenwashing efforts.

Elisabeth de Gramont, Chief Brand Officer, Frank and Oak

Elisabeth leads sustainability and impact for Frank And Oak, where she is responsible for bringing together stakeholders across functions to drive sustainability efforts, impact reporting, and communicating these issues to customers. She is highly involved in seeking out new solutions for the brand to increase efforts in circular design, supply chain transparency, and product life cycle analysis. Elisabeth is also the Chief Brand Officer for Unified Commerce Group, Frank And Oak's parent company, where she focuses on leading marketing strategy and developing brand propositions for Frank And Oak and LA-based Spiritual Gangster, as well as a growing portfolio of purpose-driven fashion retail brands in the USA and Canada.

George Harding Rolls, Campaign Lead, Action Speaks Louder

George Harding-Rolls is Campaign Lead at Action Speaks Louder with over 12 years experience in campaigning and sustainability. He was formerly Director of Policy and Advocacy at Eco-Age, and led campaigns on plastics and fashion at corporate accountability non-profit the Changing Markets Foundation. Prior to this George has worked across the civil society sector with a focus on strategic communications, working for Forum for the Future, for Beijing-based philanthropic advisors, Charitarian, and for leading digital agency,

Jellyfish. George is also an advisory board member of the Conscious Advertising Network.

Linda Wegelin, Group Chief Commercial Officer - TESTEX AG

Linda Wegelin is a dynamic marketing professional with several years of experience in the sustainability sector, particularly in uncovering environmental hotspots along supply chains. As a business strategist, she takes decisions with both an environmental conscious and a customer-centric approach. As the Group Chief Commercial Officer at TESTEX AG, Linda’s strategic foresight and proactive initiatives underscore her role as a dynamic force in navigating the ever-evolving landscape of the textile and sustainability industry. Working with a number of Fortune 500 corporations, she has gained a deep understanding of the pain points of brands and retailers in the area of corporate responsibility. Linda’s aim is to build bridges between brands and retailers and to help bring more transparency into their supply chains, therefore promoting consumer confidence in their products.

Myriam Laroche, Senior Apparel & Textile Sustainability Strategist & Co-Founder, Collective Détour

Co-founder & Strategist in sustainable fashion and textile circularity at Collective Détour, Myriam Laroche has been working in the fashion industry since 1994. In 2009, she decided to devote herself exclusively to the sustainable development of methods and strategies for designing, manufacturing, distributing, marketing, recycling, and reusing apparel and textiles. As the founder of Eco Fashion Week (EFW), an internationally renowned event, she led 13 editions from 2010 to 2017 in Vancouver, Seattle, and Toronto.

Rachel Kitchin, Senior Corporate Climate Campaigner, Fashion & I.T., Stand.earth

Rachel Kitchin is a Senior Corporate Climate Campaigner for Fossil Free Fashion and IT at environmental NGO Stand.earth, working to kick fossil fuels out of the fashion and tech industries' supply chains. Since 2017, Stand.earth has been changing the fashion industry by moving major brands to take industry-leading climate positions, and publishes the Fossil Free Fashion Scorecard to hold the sector to account. Rachel currently leads Stand's corporate advocacy and engagement work targeting the fashion industry's climate impacts, and brings years of experience in corporate and government advocacy on a wide range of issues from fighting plastic pollution in Canada to stopping wetland destruction and protecting wildlife.

Sage Paul, Executive & Artistic Director and co-founder of Indigenous Fashion Arts

Sage Paul is an urban Denesuline woman based in Toronto and a member of the English River First Nation—her ethos centres on family, sovereignty and resistance for balance. Sage is the Executive & Artistic Director and co-founder of Indigenous Fashion Arts. She has worked professionally as an administrator and designer in Indigenous arts for almost 20 years, creating and leading several fashion arts projects and collaborations. Sage has been recognized by her community and the art and fashion industries as a leader and changemaker.

QUESTIONS THAT GUIDED OUR STUDY

Our research set out to address three main questions, with sub questions through both the survey and expert interviews. The questions and brief answers are presented below:

What do Canadians understand, believe, and practice when it comes to fashion sustainability, their trust in the industry, response to brand claims and greenwashing?

Canadians show an increasing awareness of environmental issues in fashion, with many valuing sustainability in their purchasing decisions. However, knowledge gaps remain regarding the industry's environmental impact and greenwashing. As Ashlee Froese, branding and fashion lawyer at Froese Law, noted, "There's generally a raised consciousness about greenwashing, however, how much of a driving force this is in consumer purchasing power will vary," (personal communication, April 5, 2024) which is echoed by Elisabeth de Gramont, Chief Brand Officer at Frank & Oak, who observed that this awareness is driving more people to engage with the topic (personal communications, April 5, 2024, and April 2, 2024). However, as Myriam Laroche, co-founder of Collective Detour, explained, while Canadians are sensitive to environmental issues and want to make better choices, they often lack the ability to identify greenwashing effectively. This leads to many consumers believing they are supporting sustainable practices when they may actually be responding to misleading claims (personal communication, March 28, 2024). This highlights the need for stronger consumer education and clearer regulations to ensure sustainability claims are transparent, verifiable, and meaningful.

Generational differences also impact Canadians' ability to recognize greenwashing, as Dr. Wren Montgomery from Ivey Business School pointed out. Younger, social-media-savvy consumers in their 20s often have a heightened awareness and ability to detect greenwashing compared to older generations, who may find greenwashing harder to recognize due to less familiarity with social media tactics (personal communication, March 18, 2024). Experts further cite a lack of clear legislative regulation as a key factor limiting greenwashing awareness. At the time of our interview, Rachel Kitchin from Stand.earth referred to Canada's outdated Competition Act, noting that it rarely results in convictions for greenwashing, which in turn leaves consumers feeling unsupported and uninformed about their role within the regulatory system. Kitchin suggests that more robust legislation in Europe could provide a model for Canada (personal communication, April 8, 2024). George Harding Rolls, Campaign Lead at Action Speaks Louder, believes that as high-profile greenwashing cases appear in the media—such as the recent complaint against lululemon—awareness among Canadian consumers may grow, potentially sparking further demand for transparency and stricter regulations (personal communication, April 23, 2024).

In summary, while Canadians increasingly value sustainable fashion, the lack of legislative support and generational disparities in greenwashing awareness make it challenging for consumers to navigate these claims effectively. High-profile cases in the media may boost consumer awareness and demand for transparency, potentially prompting further regulatory action.

Is sustainable fashion accessible for all consumers across Canada, including those with lower income and in remote communities?

Based on the data provided, it appears that there is a mixed perception of how accessible sustainable fashion is among consumers across Canada. While a significant portion of participants find sustainable fashion hard to find (29%) and consider it expensive (36%), there is a growing awareness of sustainable or eco-fashion among more than 50% of participants. Furthermore, a majority of those who recognize sustainable fashion have purchased such items (68%). This suggests that while there may be challenges in accessibility and affordability, there is a willingness among consumers to engage with sustainable fashion when it is available to them. For more detailed insights, please refer to the section on Consumer Awareness and Preferences for Eco & Sustainable Fashion.

Using a Chi-squared test, findings revealed that Indigenous people, compared to others, are more likely to have seen and purchased eco-friendly clothing. This trend holds true even for those living on reserve, indicating increased exposure to sustainable options. Additionally, regardless of ethnicity, consumers in remote areas reported similar access to eco-friendly clothing. The results suggest that sustainable fashion is not only recognized but also actively purchased by Indigenous people, even those who live primarily on-reserve, more often than expected. Finally, those living in a remote area (both Indigenous and non-Indigenous) have purchased clothing labelled eco-friendly or sustainable, similar to other groups. See also Indigenous Perspectives on Sustainable Fashion, these findings indicate a growth in sustainable fashion awareness and purchasing across Canada, even in remote and Indigenous communities, although affordability and availability continue to be challenges for full accessibility. Increasing awareness and interest suggest a positive trend toward inclusivity, but further efforts are needed to fully bridge the accessibility gap.

How knowledgeable are consumers about the environmental liabilities associated with the clothing industry? Has this influenced the way they acquire, maintain and dispose of clothing?

The data highlights a significant variance in consumer awareness regarding the environmental impact of the clothing industry. About 50% of survey participants were already informed about the industry's negative effects, while 30% discovered this information for the first time during the survey. Notably, nearly 20% expressed skepticism toward the facts presented, underscoring the diverse levels of knowledge and awareness among consumers (see section Eco vs Sustainable: Do Labels Shape Consumer Choices for specific statistics). Following exposure to this information, 69% of participants reported that it significantly influenced their perception of the clothing industry, and 68% indicated that it impacted their purchasing and wearing habits. Additionally, 67% expressed a desire to learn more about the sustainability practices of the brands they support, while 53% felt that affecting meaningful change in the industry’s impact was beyond their individual control. Notably, 80% of participants who had purchased eco-friendly or sustainable fashion were motivated by a genuine desire to contribute positively to the environment (see section What Consumers Know About Fashion’s Impact for further insights on consumer preferences and environmental considerations).

Insights from expert interviews support this range in consumer awareness. Ashlee Froese of Froese Law (personal communication, April 5, 2024) suggested that many consumers view apparel primarily as “functional pieces” that meet a personal need, such as warmth or style, and may not necessarily consider the broader environmental impact. George Harding Rolls of Action Speaks Louder (personal communication, April 23, 2024) observed that a significant portion of young consumers, particularly those under 25 who gravitate toward ultra-fast fashion brands like Shein, often display a lack of awareness—or even disengagement—regarding the industry’s environmental liabilities. For this group, greenwashing practices may go largely unnoticed or unconsidered. In contrast, Dr. Wren Montgomery of Ivey Business School (personal communication, March 18, 2024) noted that her students, who are also in their 20s, demonstrate a high sensitivity to environmental issues, suggesting that awareness and concern can vary widely even within the same generation. These findings indicate a spectrum of knowledge and sensitivity to environmental issues associated with fashion, where some consumers are motivated to make sustainable choices, while others remain largely unaware or indifferent to the environmental implications of their fashion choices.

How knowledgeable are consumers about sustainable fashion? What signals ‘sustainability’ to them? What are the motivators and barriers to acquisition?

Survey participants demonstrated a moderate level of knowledge about sustainable fashion. Key indicators that signal “sustainability” to consumers include natural fibres, recognized by 55% of participants, and organic fibres, noted by 49%. When describing “eco-friendly” or “sustainable” fashion, many participants associate it with attributes like comfort (49%) and durability (39%), reflecting consumer expectations that sustainable fashion should also deliver quality and longevity.

Motivators for purchasing sustainable fashion largely stem from a desire to make a positive environmental impact, as demonstrated by 80% of eco-fashion buyers in a related survey question. However, significant barriers still hinder acquisition. For 36% of participants, the perception that sustainable fashion is expensive posed a major obstacle, while 29% reported difficulty in finding sustainable options, highlighting issues of affordability and accessibility. These findings suggest that although awareness of sustainable fashion is on the rise and consumers are eager to engage with it, addressing barriers related to cost and accessibility is crucial for brands aiming to enhance adoption rates.

See section Sustainable Living: A Closer Look for more detailed insights on consumer awareness, motivators, and barriers to sustainable fashion.

Do indigenous people who have an inherent connection to the environment differ in their attitudes toward sustainable fashion and greenwashing?

An ANOVA reveals that Indigenous participants demonstrate stronger environmental attitudes compared to other heritage groups, indicating a deeper commitment to sustainability. They actively seek to minimize the environmental impact of their clothing by opting for repairs, reducing washing frequency, wearing garments until they can no longer be used, and shopping online. However, they are less likely to repair their clothes themselves.

When it comes to practices such as air-drying clothes, donating used garments, and preventing microplastic pollution, Indigenous participants respond similarly to other groups. Their motivations for purchasing sustainable clothing also set them apart: they express greater concern about the chemicals in clothing, the potential health impacts on their children, and the working conditions of garment workers (see section Indigenous Perspectives on Sustainable Fashion).

In an interview with Sage Paul, a member of the English River First Nation and the executive and artistic director of Indigenous Fashion Arts, she described the unique approach Indigenous people in the fashion industry take towards their work. “We have a very specific way that doesn't align with the mainstream industry. However, our community supports one another, ensuring that everyone can earn a livelihood,” Paul explained (personal communication, September 9, 2024). She emphasized a “value system” passed down through generations, which encourages Indigenous consumers to prioritize the craftsmanship and identity of garment makers—values that set their approach apart from mainstream consumer culture.

How much trust do consumers have in the industry, particularly in terms of sustainability claims in-store/on hang tags, in social media, on websites, etc? Do they feel vulnerable?

Interviews with experts reveal a general propensity among Canadian consumers to trust domestic companies more than international ones. George Harding Rolls of Action Speaks Louder observed that “Canada might have a higher degree of trust, because there's not been those kinds of scandals yet,” (personal communication, April 23, 2024). Dr. Wren Montgomery added that when buying domestically (personal communication, March 18, 2024). This trust, experts suggest, may stem from a lack of major greenwashing scandals involving Canadian brands, which has shielded local companies from significant scrutiny.

To assess consumer trust in companies' sustainability claims, we posed specific questions to survey participants. Transparency emerged as a crucial factor in fostering this trust, yet only 7% of respondents felt that companies are "very transparent" about their sustainability practices. Meanwhile, 37% categorized companies as "somewhat transparent," while a significant 76% rated them as "not very transparent" or "not at all transparent." These findings indicate a considerable opportunity for improvement, underscoring the need for companies to prioritize transparency in their sustainability efforts to enhance consumer-brand relationships (see section Who Do Consumers Trust for further details).

When asked about verifying sustainability claims, a majority of participants (54%) reported that they never or rarely check these claims on hang tags, social media, or websites. Remarkably, 32% of these individuals admitted they simply trust the companies' assertions without seeking additional proof. This reliance on unverified trust exposes consumers to the risk of deception. The findings reveal a significant gap between consumer trust and the transparency necessary to support that trust, emphasizing the urgent need for companies to improve visibility and honesty in their sustainability communications (see section Verifying Sustainability Claims for further details).

How perceptive are consumers to greenwashing? How do they react to and recognize it? Does it influence the way they think about a product, brand or store?

Interviews with experts reveal a general propensity among Canadian consumers to trust domestic companies more than international ones. George Harding Rolls of Action Speaks Louder observed that “Canada might have a higher degree of trust, because there's not been those kinds of scandals yet,” (personal communication, April 23, 2024). Dr. Wren Montgomery added that there is a “belief that Canadian companies are better,” which influences consumer trust and gives them a sense of protection

When we asked participants if they understood the concept of greenwashing, 74% responded that they did not. However, after receiving an explanation, a substantial number acknowledged that greenwashing is a serious issue within the fashion industry. Many respondents reported recognizing instances of greenwashing by fashion brands, citing examples such as the use of greenery in advertising images and vague, misleading terminology (see section Greenwashing: A Serious Issue Few Can Name).

However, a key challenge revealed by the study is that many participants struggled to identify greenwashing in the visual examples we presented, which highlights their vulnerability to deceptive marketing tactics (see section Greenwashing: A Serious Issue Few Can Name). This limited awareness of greenwashing impacts how consumers perceive and evaluate products, brands, and retailers in the fashion industry. While consumers tend to view greenwashing negatively when they recognize it, their lack of understanding and ability to identify such practices hinders their capacity to fully assess and respond to them. As a result, brands may continue to foster positive impressions, even when engaging in misleading claims.

How can consumers be made aware of and protected from greenwashing and other misleading claims?

Expert interviews emphasized the role of certifications in protecting consumers from greenwashing. Ashlee Froese of Froese Law explained that certifications add an “additional regulatory level whereby companies must meet specific thresholds to obtain and also maintain those certifications. It provides the consumer with greater assurances.” (personal communication, April 5, 2024). However, these certifications can sometimes cause confusion, as they are often managed by private entities and lack standardization. Rachel Kitchin from Stand.earth (personal communication, April 8, 2024) highlighted this need for public regulation, stating that “some kind of standard setting” beyond private companies is essential.” She noted that the EU is beginning to address this by defining acceptable certifications.

The report highlights the critical role of consumer education in combating greenwashing. Over 75% of survey respondents expressed concern about the issue, yet only about half could effectively identify misleading claims. Linda Wegelin, CCO at TESTEX AG, emphasized the importance of education "from a young age" (personal communication, April 10, 2024), a sentiment echoed in the report's findings that consumers often struggle to recognize misleading terminology. For instance, many participants found terms like "circular" and "sustainably sourced" persuasive, despite lacking concrete verification.

The recently passed Bill C-59, an amendment to Canada's Competition Act, aims to address greenwashing by requiring companies to provide verifiable proof for their environmental claims. If effectively enforced, this legislation could help distinguish genuinely sustainable brands from those making misleading assertions, thereby empowering consumers to make more informed purchasing decisions.

Do consumers feel protected from greenwashing? Are they aware of certification and does that play a role?

The survey data indicates that many participants may not feel adequately protected from greenwashing. With 74% of respondents unfamiliar with the term "greenwashing" and 65% unaware of the Canadian government's Competition Act—which prohibits false or misleading representations—there is a clear concern regarding consumer awareness of protective measures against deceptive practices. This lack of familiarity with essential concepts and regulations highlights a significant gap in consumer understanding, emphasizing the urgent need for enhanced education and awareness about greenwashing and related protections. By improving knowledge of certifications and government regulations, consumers can be better equipped to make informed decisions and recognize misleading claims in the marketplace.

What can be done to heighten trust in the industry? What voices, words, images or media would be most effective? How can a broad range of Canadian consumers be educated about these issues?

To build trust in the fashion industry and effectively educate Canadian consumers about sustainability issues, clothing brands must prioritize transparency in their practices. This includes being honest about the materials they use, ensuring accuracy in environmental and sustainability claims, communicating initiatives in clear and accessible language, and demonstrating transparency in the management of unsold merchandise.

Leveraging the credibility of environmental NGOs is essential, as survey participants identified these organizations as the most trustworthy sources for identifying greenwashing. While older demographics tend to place more trust in environmental NGOs, younger audiences often look to influencers, bloggers, celebrities, and news and fashion media for guidance.

To effectively educate Canadian consumers, a multi-faceted approach is recommended. This could involve collaborating with environmental NGOs to amplify messaging, engaging with influencers and bloggers to reach younger demographics, utilizing news and fashion media for broader outreach, and fostering personal connections within companies to build trust. By employing a diverse array of voices, visuals, and media channels, clothing brands can enhance trust and awareness among a wide range of consumers across Canada (see section Who Do Consumers Trust).

How can the government, the fashion industry, NGOs and educators support consumers in making sustainable or more sustainable fashion choices?

Our interviewees expressed optimism about government

intervention and regulation as effective strategies to combat greenwashing and restore consumer trust in the fashion industry. George Harding Rolls of Action Speaks Louder emphasized that “this shift needs to be led by policy,” (personal communication, April 23, 2024), highlighting the importance of strong regulatory frameworks. Dr. Wren Montgomery echoed this sentiment, advocating for regulations that would render certain misleading claims illegal, noting that “we can’t rely on consumers to read sustainability reports” (personal communication, March 18, 2024) to discern truthful assertions. Myriam Laroche of Collective Détour also underscored the government's role in educating and encouraging consumers to make more ethically conscious purchasing decisions.

Survey data reinforces this perspective, showing robust public support for government action to protect Canadians from greenwashing by clothing companies. Specifically, 76% of participants agreed that the government should impose fines on companies that misrepresent their sustainability practices. Additionally, 75% supported the establishment of guidelines for advertising and communication related to greenwashing in the fashion industry. Although participants may not be fully familiar with the current provisions of the Competition Act, they clearly desire stronger protections, enhanced enforcement, and greater accountability to ensure transparency in sustainability claims across the industry (see section Government's Role: Awareness of Greenwashing Regulations for more details).

WHO WE SURVEYED

We aimed to collect 2,000 consumer responses from all provinces and territories in Canada. Recognizing that French is the first official language for approximately 22% of Canadians (Statistics Canada, 2024a), we set a target of around 440 participants who could respond in French. To ensure adequate representation of Canadian Francophones, we slightly oversampled this group, aiming for 500 French responses. The survey was made available in both French and English to eliminate language barriers. Ultimately, 323 participants completed the questionnaire in French, while 455 responses came from Quebec.

To minimize biases and engage participants genuinely interested in fashion, we began by asking whether they shop for products across various categories, including food, personal care, home care, clothing, and automobiles. Participants were required to confirm their experience in shopping for and making decisions about clothing, ensuring their responses were based on firsthand knowledge. Additionally, we requested that they purchase clothing at least once every two years.

In 2023, Canada's population included approximately 20.02 million males (49.9%) and slightly fewer females, around 20.09 million (50.1%) (Statistics Canada, 2024). While specific percentages for non-binary and transgender individuals are not provided in these statistics, 2021 census data indicated that about one in 300 people aged 15 and older in Canada identify as transgender or non-binary



(Statistics Canada, 2023, n.a.). This translates to roughly 59,460 transgender individuals (0.19%) and 41,355 non-binary individuals (0.14%) among those aged 15 and older (Statistics Canada, 2023a).

In our survey, 965 participants (48%) identified as male, while 1,019 participants (51%) identified as female. Based on the assumption that one in every 300 individuals is transgender or non-binary, we would expect a sample of 2,000 to include between 6 and 7 individuals from these categories. In our survey, 11 participants (1%) identified as non-binary, with 5 choosing not to answer. This indicates that our sample is representative of the Canadian population in terms of gender.

We also established specific quotas for age groups to ensure a representative participant pool.

Our targets included a minimum of 90 participants in the 15-19 age group (with a maximum cap of 100), at least 550 participants in the 20-34 age range, 600 participants in the 35-54 age group, and a maximum of 650 participants aged 55 and older.

These targets were strategically chosen to ensure that our participants are active shoppers. Research shows that clothing consumption often declines among individuals over 60, particularly as they near retirement, while younger individuals tend to be more engaged in clothing purchases. Therefore, we specifically included younger age groups in our sampling.

Figure 1 illustrates the distribution of age groups within our sample, comparing it to the broader Canadian population as reported by Statistics Canada (2024b).

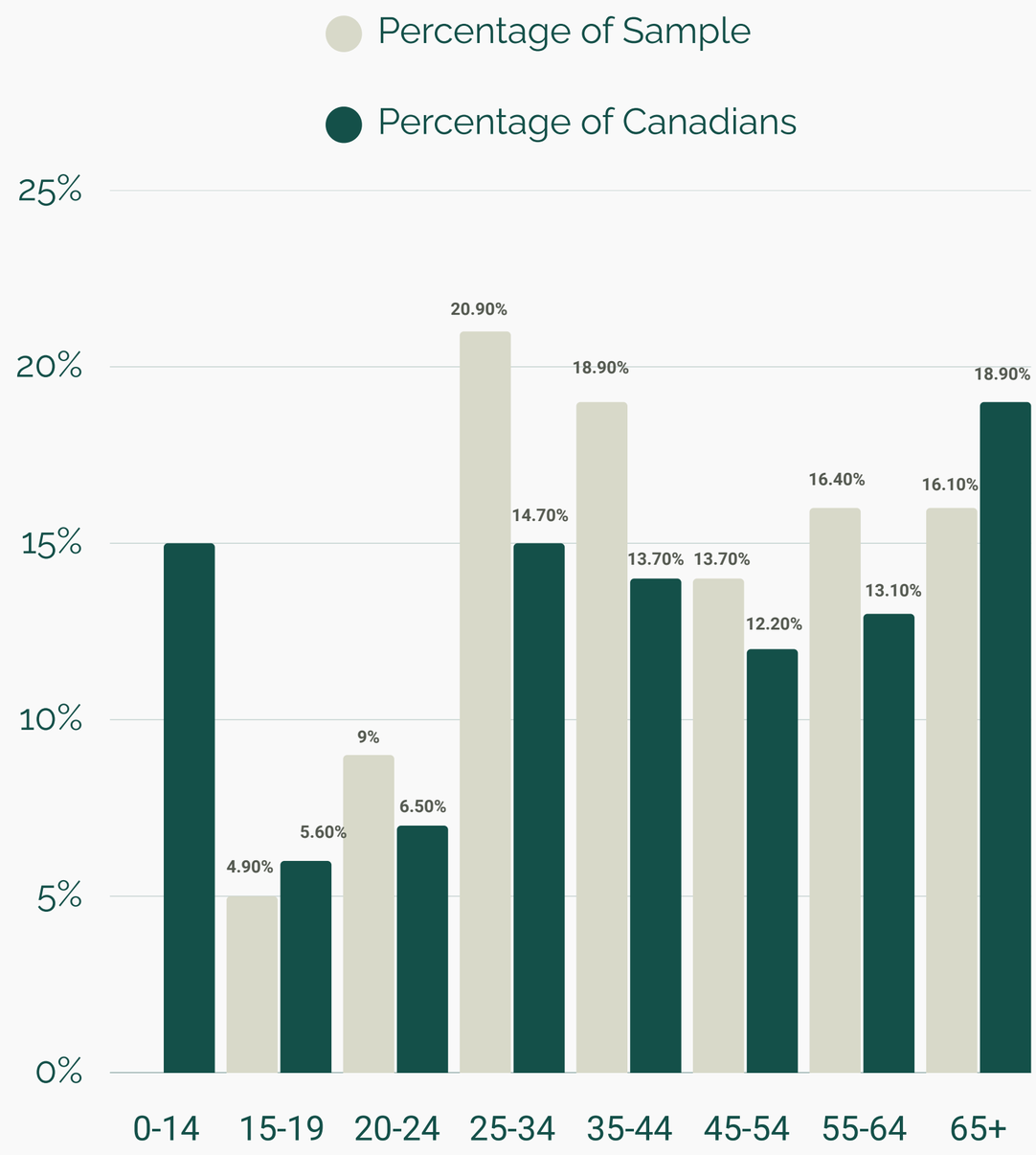


Figure 1: Age Groups of Sample in Comparison to the Canadian Population

The working-age population in Canada is between 15 and 64 years old. This age group makes up 64.8% of the total population (Statistics Canada, 2022b). In 2023, 82% of Canadians were employed full-time, while 18% were employed part-time (Statistics Canada, 2023b). Table 1 shows the working status of our participants, with 48% working full-time, 12% working part-time, 19% retired, and 7% are students.

We asked our participants whether they lived alone or how many people currently live in their households. Figure 2 compares our sample with data from Statistics Canada (2021b). The figure shows that our sample is very similar to the Canadian population, in categories with two, four, five, and more than five people in a -household, with a one—or two percent difference. Only the number of single households and the households with three people differs by more than 2%, possibly because of the two-year difference between the statistics and the survey.

To gain insight into our participants' financial situations, we inquired about their annual household income before taxes. However, it’s important to note that this measure is a limited indicator of overall wealth, as income

Table 1: Working Status of Participants

Work Status	Frequency	Percentage
Working full-time	956	48%
Working part-time	244	12%
Homemaker	73	4%
Student	130	7%
Retired	370	19%
Unemployed, looking for work	104	5%
Unemployed, not looking for work	57	3%
Other (write-in)	44	2%
I prefer not to answer	22	1%
Total	2000	101% *[1]

*1% rounding error.

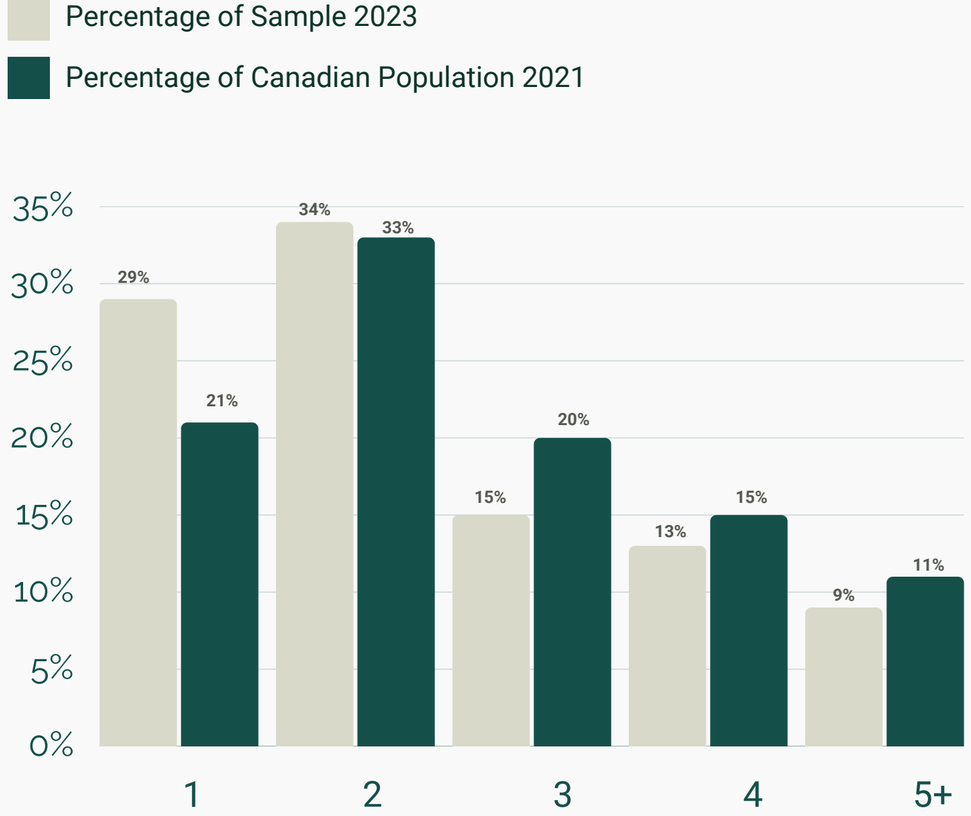


Figure 2: Number of People in Household

can be influenced by factors such as family structure, gender, and geographic location. For instance, during the 2019–2020 income period, the average income for 15- to 19-year-olds was $10,710, the lowest among all age groups, while those aged 45 to 49 had the highest average income at $73,800. Notably, when examining female earners, the averFage income for 15- to 19-year-olds decreased slightly to $10,450, and for women aged 45 to 49, it dropped by $11,441 to $62,359 (Statistics Canada, 2021c).

Although we cannot make direct comparisons with Statistics Canada's data, our survey shows that the percentage of participants reporting household incomes exceeding $100,000 before tax is slightly higher than the national average. In 2021, the median after-tax income for Canadian families and unattached individuals was $68,400 (Statistics Canada, 2021a). Our findings indicate a median income before tax in the range of $50,000 to $74,999 (see Table 2). This income distribution is likely to influence participants' perceptions regarding the affordability of sustainable clothing.

Next, we inquired about participants' heritage, offering options including Indigenous, Caucasian, Visible minority, none of the above, and other. Table 3 displays the distribution of responses. We aimed for a target of 100 participants (5%) with Indigenous backgrounds, aligning with Statistics Canada's report that s make up approximately 5% of the Canadian population (Statistics Canada, 2022a).

Table 2: Household income before tax

Income	Frequency	Percentage
Less than $ 10,000 per year	64	3%
Between $ 10,000 and $ 34,999 per year	333	17%
Between $ 35,000 and $ 49,999 per year	277	14%
Between $ 50,000 and $74,999	264	18%
Between $ 75,000 and $ 99,999	287	14%
Between $100,000 and $ 149,999	275	14%
Between $ 150,000 and $ 199,999	113	6%
Between $ 200,000 and $ 249,999	54	3%
$ 250,000 or more	37	2%
Don't know	28	1%
I prefer not to answer	168	8%
Total	2000	100%

Table 3: Heritage of Participants

Heritage	Frequency	Percentage
Indigenous (First Nations/Métis/Inuit)	100	5%
Caucasian	1339	67%
Visible minority	283	14%
Other	83	4%
None of the above	195	10%
Total	2000	100%

Table 4: Participants living on - off-reserve

Living	Frequency	Percentage
Primarily on reserve	21	31%
Primarily off reserve	55	55%
Both on reserve and off reserve	4	4%
None of the above	1	1%
Other	9	9%
Total	100	100%

SUSTAINABILITY OR GREENWASHING? THE BLURRED LINES IN FASHION

In light of the urgent need to address risks and disasters stemming from land degradation, biodiversity loss, pollution, and climate change, there is a growing demand for environmentally friendly products and sustainable businesses.

To appeal to increasingly eco-conscious consumers, many companies are positioning themselves as responsible corporate citizens committed to sustainability. While the United Nations' 17 Sustainable Development Goals (SDGs) provide a comprehensive framework for promoting peace and prosperity for both people and the planet, there is still considerable ambiguity surrounding the definition of sustainable fashion.

Many individuals may feel they intuitively understand sustainable fashion, yet the term holds various meanings and interpretations. Not everyone agrees on its core pillars; while some emphasize environmental concerns and poverty alleviation, others incorporate issues like animal rights, gender-based violence, and inclusivity across age, size, and gender. While these topics are undeniably significant, they are not always aligned with sustainability goals and may instead reflect broader issues of structural inequality within the industry.

There is widespread confusion about sustainable fashion, with ambiguous terminology often obscuring a garment's true environmental impact and the working conditions behind it. This ambiguity allows brands to create their own definitions, often leading to greenwashing as they attempt to enhance or

DEFINITION: SUSTAINABLE FASHION

Although there is no standard definition of sustainable fashion (Gordon & Hill, 2015, p. XV), the term is often used to describe fashion designed and produced under environmental and ethical conditions, and more recent descriptions also take the consumer into account — including how they purchase, use and discard fashion clothing (Gordon & Hill, 2015; Gwilt & Rissanen, 2011). Fletcher suggested the following description: "sustainability in fashion and textiles fosters ecological integrity, social quality and human flourishing through products, action, relationships and practice use" (Fletcher, 2013, p. 16). Conversely, Weber's (2021) definition of a sustainable fashion company more closely resembles a broader definition of sustainable development. Weber explains that a sustainable fashion company ensures that resources are not depleted and the environment is not destroyed or exploited. A sustainable fashion company seeks to eradicate poverty rather than create it. As with sustainable development, social, environmental, and economic factors are given equal importance.

restore their reputations without genuine accountability.

DEFINITION: GREENWASHING

Greenwashing lacks a single definition, but it generally encompasses two key behaviours: withholding negative information about a company's environmental performance while promoting positive claims. Delmas and Burbano (2011) encapsulate this concept by describing greenwashing as "the intersection of two firm behaviours: poor environmental performance and positive communication about environmental performance" (Delmas & Burbano, 2011, p. 65). This duality highlights the deceptive practices that can mislead consumers about a brand's true environmental impact.

We asked each of our expert interviewees to share three words that come to mind when they hear “greenwashing”. Their answers are captured in the word cloud on the next page (see Figure 3).

The word cloud prominently highlights two key terms: "misleading" and "marketing." These concepts are intertwined when organizations prioritize using sustainability as a marketing tool rather than genuinely pursuing meaningful change. Misleading consumers through false or unsubstantiated claims about the sustainability of products, services, or overall business practices is a significant concern.

For consumers aiming to make more sustainable choices, access to reliable information about the environmental impact of their purchases is essential. This information may appear on packaging, product descriptions, labels, or hang tags. However, many brands opt for vague sustainability claims—such as "eco-friendly" or "biodegradable"—that are self-reported and lack third-party verification. Consumers must critically assess these claims to ensure they are trustworthy, comparable, and verifiable. In contrast, third-party certifications offer a standardized approach to measuring and communicating sustainability. While ecolabels can be a crucial tool for consumers seeking proof of sustainability, it is vital that these labels adhere to scientific standards and do not mislead. If consumers do not fully understand what these certifications measure, they remain at risk of falling victim to greenwashing.

obfuscating
greed
hypocrite
serious
image
misleading
deceptive
serious
marketing
lying
endemic
capitalism
appearance
profit
tricky
misleading
obfuscating
sugar-coating
fluff
capitalism
greed
marketing

Figure 3: Word Cloud of terms used to describe greenwashing by industry experts



IN FOCUS:

TERMINOLOGY ASSOCIATED WITH GREENWASHING

In addition to greenwashing, several related terms describe the ways companies may misrepresent or downplay their environmental and social responsibility efforts. These terms—bluewashing, brownwashing, greenhushing, and greenwishing—highlight various strategies used to shape public perception while avoiding full transparency about their actual practices.

Bluewashing: follows a similar, albeit broader, approach to greenwashing via implied corporate participation in the United Nations Global Compact (UNGC). The voluntary, participatory U.N. Global Compact is composed of Ten Principles, integrating “fundamental responsibilities in the areas of human rights, labour, environment, and anti-corruption” (UNGC, n.d.) Firms partaking in bluewashing imply a practice of greater social responsibility than they truly exhibit (Berliner & Prakash, 2015). ‘Bluewashing’ is used in reference to the United Nations’ signature blue logo colouring (Sailer et al., 2022).

Brownwashing/ Greenhushing: Both terms describe the downplaying of a firm’s environmental performance. Firms partaking in ‘brownwashing’ may opt to downplay, or curtail, promotion of their environmental endeavours (Montgomery & Robertson, 2022). The systematic practice of brownwashing is not yet fully understood in the literature; it may occur because companies are afraid of being accused of conducting greenwashing and instead prefer to maintain silence to avoid any public attention.

Greenwishing: This practice involves the act of disseminating symbolic yet unsubstantiated green claims (‘wishful thinking).

All terms cater to the diffusion of a pro-social brand or product image and perception among consumer audiences. The challenge that remains is how brands can communicate their positive environmental progress, leading to positive consumer reactions, while remaining honest that their progress might be marginal and may not solve the issue.

THE ROOTS OF GREENWASHING

Greenwashing has roots that trace back to the 1960s when the nuclear power division of Westinghouse Electric Corporation sought to counteract the anti-nuclear movement by promoting the safety, cleanliness, and reliability of nuclear power plants. This movement raised serious concerns about the safety and environmental impacts of nuclear energy, often accusing the industry of making misleading claims. However, the term "greenwashing" itself was not coined until 1986 by American environmentalist Jay Westerveld, who popularized it in his essay, "It all comes out in the greenwash" (Watson, 2016). In the years that followed, the complexity of greenwashing continued to evolve.

According to Delmas and Burbano (2011), greenwashing can be understood on two levels: the "firm-level," where companies make misleading environmental claims at the corporate level, and the "product-level," where these claims are specific to individual products or services (Delmas & Burbano, 2011, p. 66).

In 2008 and 2009, the Ottawa-based marketing firm TerraChoice conducted comprehensive research on consumer goods in Canada and the U.S., documenting every product that made an environmental claim. These claims were evaluated against guidelines from the U.S. Federal Trade Commission, the Competition Bureau of Canada, the Australian Competition & Consumer Commission, and ISO 14021. The findings were published in the "Seven Sins of Greenwashing," a report designed to help consumers identify misleading or false environmental claims, particularly at the product level. This report aimed not only to inform consumers but also to deter companies from engaging in greenwashing, instead encouraging them to adopt more sustainable business practices.

Key insights from the study revealed a significant rise in eco-labeling, with 98% of the 2,219 examined products committing at least one of the Seven Sins of Greenwashing, underscoring that this issue is a global concern. While TerraChoice did not focus specifically on clothing, the findings highlight prevalent greenwashing practices in Canada. The Seven Sins, ranked by frequency, are as follows: Hidden Trade-Offs (70%), No Proof (60%), Vagueness (51%), Worshipping False Labels (23%), Irrelevance (7%), Lesser of Two Evils (5%), and Fibbing (1%) (TerraChoice, 2009). The table on page 36 provides an overview of these sins, complete with descriptions and examples from the fashion industry.

Parguel et al. (2015) defined "executional greenwashing" as a tactic where imagery and colour, evocative of nature and ecology, are used to imply greenness without any explicit claim or statement being made that the product is better for the environment (p. 10). Executional greenwashing differs from greenwashing claims, which explicitly state green product attribute[s] (p. 7).

Greenwashing is an increasingly urgent public

concern, with the topic gaining significant momentum. A recent episode of "New Reality," aired nationally on Global News, highlighted how Canadian shoppers might be misled by eco claims when purchasing clothing. The fashion sector was described as the “Wild West” due to a lack of regulations and enforcement mechanisms preventing companies from engaging in misleading practices (Robinson, 2023).

A 2023 review by Montgomery, Lyon, and Barg noted a dramatic rise in media coverage of greenwashing, from around 300 stories annually a decade ago to over 2,000 in 2021 (Montgomery et al., 2023). An empirical search on Google Trends indicates that interest in 'greenwashing' has steadily increased over the past several years, both in Canada and globally. Reports like Deloitte's “Creating Value from Sustainable Products” reveal that consumers are becoming increasingly skeptical and frustrated with businesses' sustainability claims. According to Deloitte, a significant 62% of Canadian consumers would be willing to pay a premium of 20% or more for sustainable products. However, 49% express skepticism about these claims, and 23% are discouraged by the challenges of identifying genuine sustainability efforts versus greenwashing (Pieters et al., 2023).

Media coverage plays a vital role in engaging stakeholders on the issue of greenwashing. Journalistic perspectives can foster online discussions and educational initiatives aimed at countering greenwashing, enhancing public resilience against such practices (Fernandes et al., 2020). Furthermore, "greenwashing literacy education," integrated within broader media literacy training, can empower consumers by enhancing their understanding of sustainability and environmental stewardship (Eng et al., 2021).



Table 5: The Seven Sins of Greenwashing

Reference: (TerraChoice, 2009)

Sin	Description	Example
The sin of the hidden trade –off	A claim suggesting that a product is 'green' based on a narrow set of attributes without attention to other important environmental issues.	Cotton isn't automatically sustainable just because it's a natural fibre. Its production often involves pesticides, herbicides, and chlorine bleaching, impacts that are frequently overlooked. Monoculture farming and chemical treatments degrade habitats and drive biodiversity loss—hidden trade-offs that challenge its eco-friendly reputation.
The sin of no proof	An environmental claim that cannot be substantiated by easily accessible supporting information or by a reliable third-party certification.	Garments claiming to use "less" water without evidence or transparency fall into the "no proof" category of greenwashing. When brands cite unverified percentages or vague statistics without fine print or a source, they're making sustainability claims that consumers can't fact-check—raising serious red flags.
The sin of vagueness	A claim that is poorly defined or too broad, lacking in specifics so that its real meaning is inclined to be misunderstood by the consumer.	"All-natural" is a classic case of this greenwashing sin. Arsenic, uranium, mercury, and formaldehyde are all natural—yet toxic. "Natural" doesn't always mean "green." Similarly, terms like "Non-toxic," "Green," "Eco-friendly," and "Eco-conscious" are meaningless without clear definitions or proof.
The sin of worshipping false labels	Using words or images - like fake certification logos - to falsely imply third-party environmental endorsement.	A pair of shoes in a cardboard box stamped with a certification-style logo claiming to "fight global warming" is a classic example. Vague terms like "eco-safe," "eco-preferred," or "good for the environment," combined with misleading symbols, give the illusion of credibility—without any real accountability.
The sin of irrelevance	An environmental claim that may be truthful but is unimportant or unhelpful for consumers seeking environmentally preferable products.	'CFC-free' is a common example since it is a frequent claim despite the fact that CFCs (chlorofluorocarbons) are banned by law. In Europe the same would apply to Azo dyes.
The sin of the lesser of two evils	A claim that's true within a category but distracts from its overall environmental impact.	Recycled polyester uses less energy than virgin polyester and is often seen as sustainable—but this can encourage overconsumption. In reality, turning plastic bottles into fabric has limited environmental benefit and still releases microplastics during washing.
The sin of fibbing	Environmental claims that are simply false.	This is hard for consumers to spot, making its scale difficult to measure. A key example is mislabelled "Better Cotton" or "Organic Cotton" that fails to meet standards. India, for instance, exports more "organic cotton" than it actually produces, exposing the gap between labels and reality (Wicker et al., 2022).

GREENWASHING IN THE FASHION INDUSTRY

Greenwashing in the fashion industry has dominated global headlines over the past year, with discussions focusing on brand accountability, consumer awareness, and the need for stringent regulations. For instance, Business of Fashion posed the question, "Can Fashion Stop Greenwashing?" while Glamour highlighted the issue by advising readers on how to spot the signs of greenwashing. Meanwhile, The Guardian reported that some fashion brands have paused their use of sustainability index tools amid rising greenwashing claims.

In response, companies are facing increased scrutiny, and authorities worldwide are ramping up enforcement of laws to protect consumers. The Netherlands Authority for Consumers and Markets issued five "rules of thumb" for environmental claims after investigating 70 fashion brands, giving them six weeks to comply or face significant penalties. Similarly, the European Commission has proposed a directive aimed at curbing greenwashing across all industries, including fashion. This directive would require companies to substantiate their voluntary environmental claims through rigorous assessment standards (Ragonnaud, 2024, p. 1).

In the U.S., the New York Fashion Act is set to mandate that large fashion companies disclose their social and environmental impacts.

While not exclusive to fashion, Canada is also taking action. On June 20, 2024, the Canadian Parliament passed new legislation—Bill C-59—amending the Competition Act to regulate environmental claims and combat greenwashing. This law requires companies to provide evidence for their environmental claims, utilizing internationally recognized scientific methodologies. With these increased regulations, businesses operating in Canada must proceed with caution, as failure to comply could lead to hefty fines (McGowan, 2024).

To further inform stakeholders, we have dedicated a section to greenwashing legislation, including recommendations for policymakers, (see Current Greenwashing Legislation and Recommendations Based on the Study).

Canadian NGO Stand.earth has accused lululemon Athletica, one of the country's leading fashion brands, of engaging in greenwashing. According to Stand.earth, lululemon has cultivated a carefully crafted image of environmental sustainability and wellness; however, its rapid expansion has been primarily fueled by fossil fuels. Despite significant profits and a growing number



This image was AI-generated and may contain approximations or artistic interpretations.

of stores, the company has not taken substantial steps to reduce its greenhouse gas emissions, even while asserting that its products and practices "contribute to restoring the environment".

The criticism highlights the brand's reliance on indirect emissions from its supply chain, including coal-powered factories, as well as its use of fossil-fuel-derived materials like polyester, spandex, and nylon, which are energy-intensive to produce. Stand.earth emphasizes that lululemon continues to profit from a reputation as an environmentally conscious brand, which has led to allegations of greenwashing (Stand.earth, 2024).

While the Competition Bureau is legally required to maintain confidentiality and cannot comment on ongoing investigations, Jenna Benchetrit of CBC News (2024) reports that, at this time, no conclusion of wrongdoing has been reached. Nevertheless, being implicated in greenwashing can have detrimental effects on a company's reputation. Such accusations can breed consumer skepticism regarding the brand's environmental claims, negatively impact customer satisfaction, and potentially lead to a decline in sales.

This situation underscores the urgent need to understand Canadians' awareness and perceptions of greenwashing in fashion. We aim to explore how vulnerable Canadians feel to fashion greenwashing, their awareness of this risk, their ability to recognize greenwashing claims, their reactions upon identifying such claims, and how serious they believe the issue to be.

FASHION'S GREENWASHING CRISIS

We consulted our panel of experts to gauge the severity of greenwashing in the fashion industry. Their consensus is that it represents a widespread and serious issue, characterized by a notable lack of transparency regarding environmental harm. Many companies use sustainability language and imagery to promote their products while downplaying or ignoring the actual damage they cause.

As demand for sustainable products grows, brands often prioritize marketing initiatives over genuine efforts for change. In Canada, greenwashing is particularly problematic, driven by a disparity between Environmental, Social, and Governance (ESG) claims and the realities of corporate practices. This issue is further complicated by consumers' limited understanding of greenwashing, making them vulnerable to misleading claims. The absence of clear regulations allows companies to exploit this confusion, leaving consumers misled and perpetuating a cycle of deceptive marketing. Below are individual responses from our experts.

RACHEL KITCHIN:

"It's endemic. It's hugely serious and it really shows that there's just a complete lack of honesty about how bad things are. And that's something which you just never hear, even from the most active companies, they are not fully acknowledging how bad the problem is. It's so interesting to see brands use this kind of sustainability terminology in terms of images, language, ideals to sell us on a lifestyle, but without ever really acknowledging the harm that they are doing" (R. Kitchin, personal communication, April 8, 2024).

SAGE PAUL:

"It's a serious issue. We must recognize the profound impact our actions have on the planet and on one another. In the fashion industry, we know the necessary steps to minimize harm, yet sadly, these actions often go unfulfilled. Major corporations may express a desire to improve their environmental practices, but the reality is that profit remains the priority. When sustainable practices—such as reducing production or altering harmful processes—threaten their bottom line, greenwashing becomes prevalent (S. Paul, personal communication, September 9, 2024).

LINDA WEGELIN:

"It's a very serious issue and has gotten worse. It's great that this is being tackled now, because if we want to initiate any change, it has to be rewarded. The industry puts the focus and the effort into the things that really matter, and by not regulating at the moment, by not having labelling regulated, we don't reward the ones that are actually making the effort. The topic of sustainability has gained significant importance for consumers, especially in the post-COVID landscape. Brands feel pressured to retain customers and drive revenue, yet they often lack the time and resources to invest in sustainable practices" (L. Wegelin, personal communication, April 10, 2024).

ELISABETH DE GRAMONT:
I'm not sure if the situation has improved or worsened. On one hand, the conversation around sustainability has definitely expanded, with more people engaging in the topic. This broader discourse also means that discussions about greenwashing are more prevalent. While the number of companies engaging in greenwashing may have increased, I believe that the overall awareness and intentionality surrounding sustainability have improved. More people are informed about what it truly means to be sustainable. So, it's not a matter of better or worse—it's simply that the landscape has grown" (E. de Gramont, personal communication, April 2, 2024).

DR. WREN MONTGOMERY:
It's on the rise in Canada. Definitely an increase in interest due to ESG and net zero claims which are also rising in Canada. Big banks are among the highest – all major EU and NA banks have net zero claims and they are also the biggest funders of fossil fuels" (W. Montgomery, personal communication, March 18, 2024).

ASHLEE FROESE:
There's a concerted effort to address sustainability through legislation and enforcement. For example, the Competition Act, a federal law, encompasses various areas, including marketing and advertising practices, allowing the Competition Bureau to take action against deceptive marketing. Awareness of greenwashing is growing, both from a legal enforcement perspective and among consumers. People are increasingly conscious of where they invest their money and the impact of supporting certain brands. Brand owners, too, are becoming more aware of Environmental, Social, and Governance (ESG) criteria and Corporate Social Responsibility (CSR). However, the authenticity of the brand owner's commitment may be questioned: are they genuinely invested in these issues, or are they merely responding to consumer demand? Regardless, sustainability is now a more pressing topic than ever before" (A. Froese, personal communication, April 5, 2024).

MYRIAM LAROCHE:
Greenwashing is a very serious problem. It's often used to hide the real issues, with brands using it as a distraction from the actual harm they're causing. Marketing teams are usually the ones pushing these sustainability messages, when it should really be the supply chain team's job. Greenwashing has gotten worse because there's more demand for sustainable products. Brands are focusing on developing sustainability initiatives for marketing purposes only, without really checking if what they're doing is actually sustainable. Sadly, many consumers are quick to accept these claims because they want to feel less guilty about their purchases. They see "sustainability" and assume the brand is fully committed, even if it's not. Right now, greenwashing is unfortunately really successful because people don't fully understand it and there are no regulations in place yet" (M. Laroche, personal communication, August 14, 2024).

Greenwashing in the fashion industry is a pervasive and serious issue

MEASURING ENVIRONMENTAL CONCERN

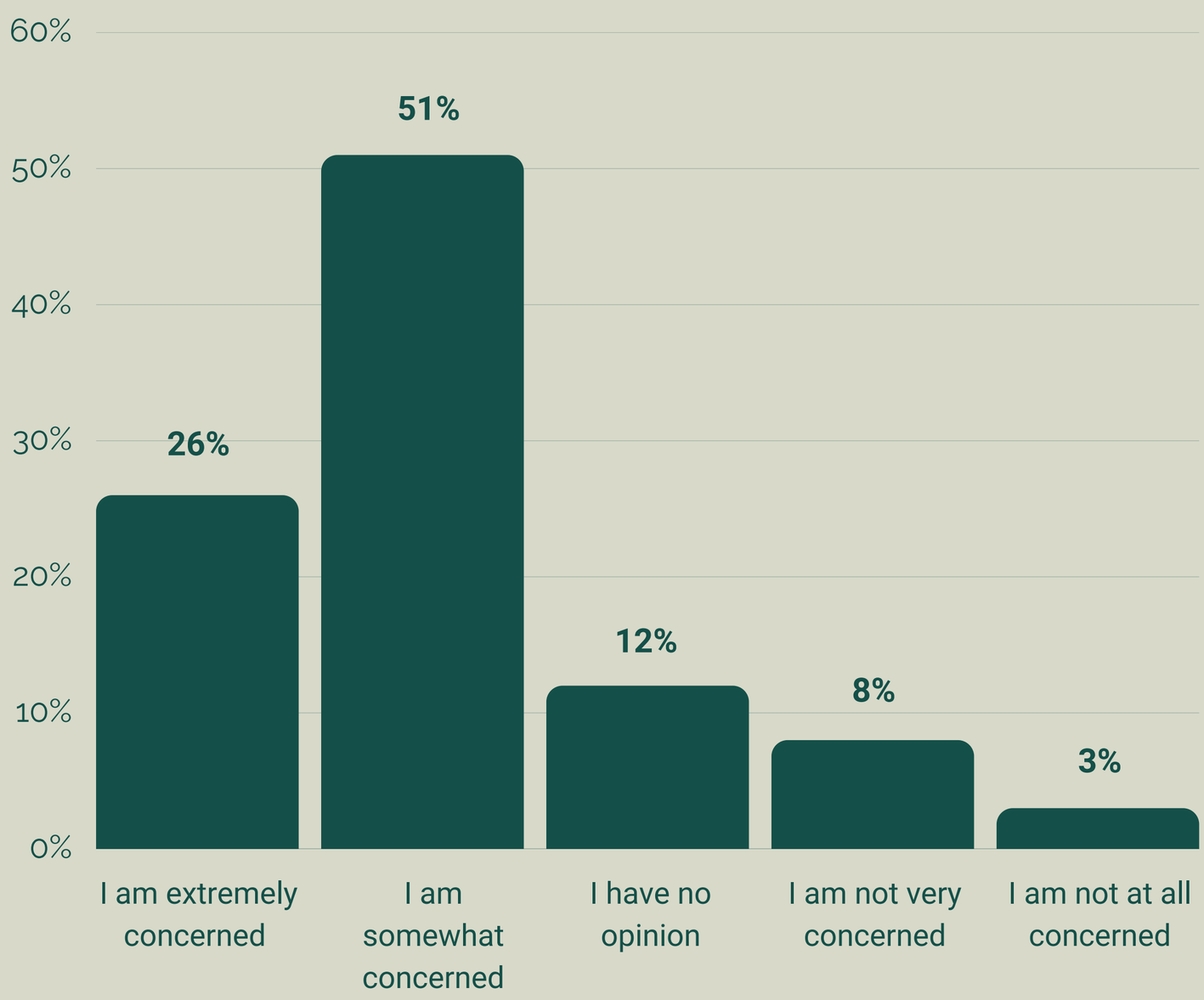


Figure 4: Environmental concerns

77% of participants claim they are concerned about the environment, with 26% being extremely concerned.

We began by assessing participants' attitudes toward environmental issues, asking whether they were concerned about these matters and their willingness to adopt a more sustainable lifestyle. As shown in Figure 4, over 75% of respondents expressed concern for environmental issues, indicating a strong awareness among the participants.

SUSTAINABLE LIVING: A CLOSER LOOK

DEFINITION: SUSTAINABLE LIVING

With 51% of participants indicating they are somewhat concerned and 26% expressing extreme concern about the environment, we sought to understand how these concerns translate into their approaches to sustainable living. We define sustainable living as making lifestyle choices that positively affect the environment, people, and animals, while striving for a smaller ecological footprint. As illustrated in Figure 5, only 5% of participants reported no interest in sustainable living. Meanwhile, 39% are actively trying to make more sustainable choices, and 23% claim they are doing everything they can to live sustainably. Notably, 13% of participants expressed a desire to live more sustainably but cited cost as a barrier. These findings reinforce our earlier observations that participants are both concerned about environmental issues and motivated to adopt more sustainable lifestyles.

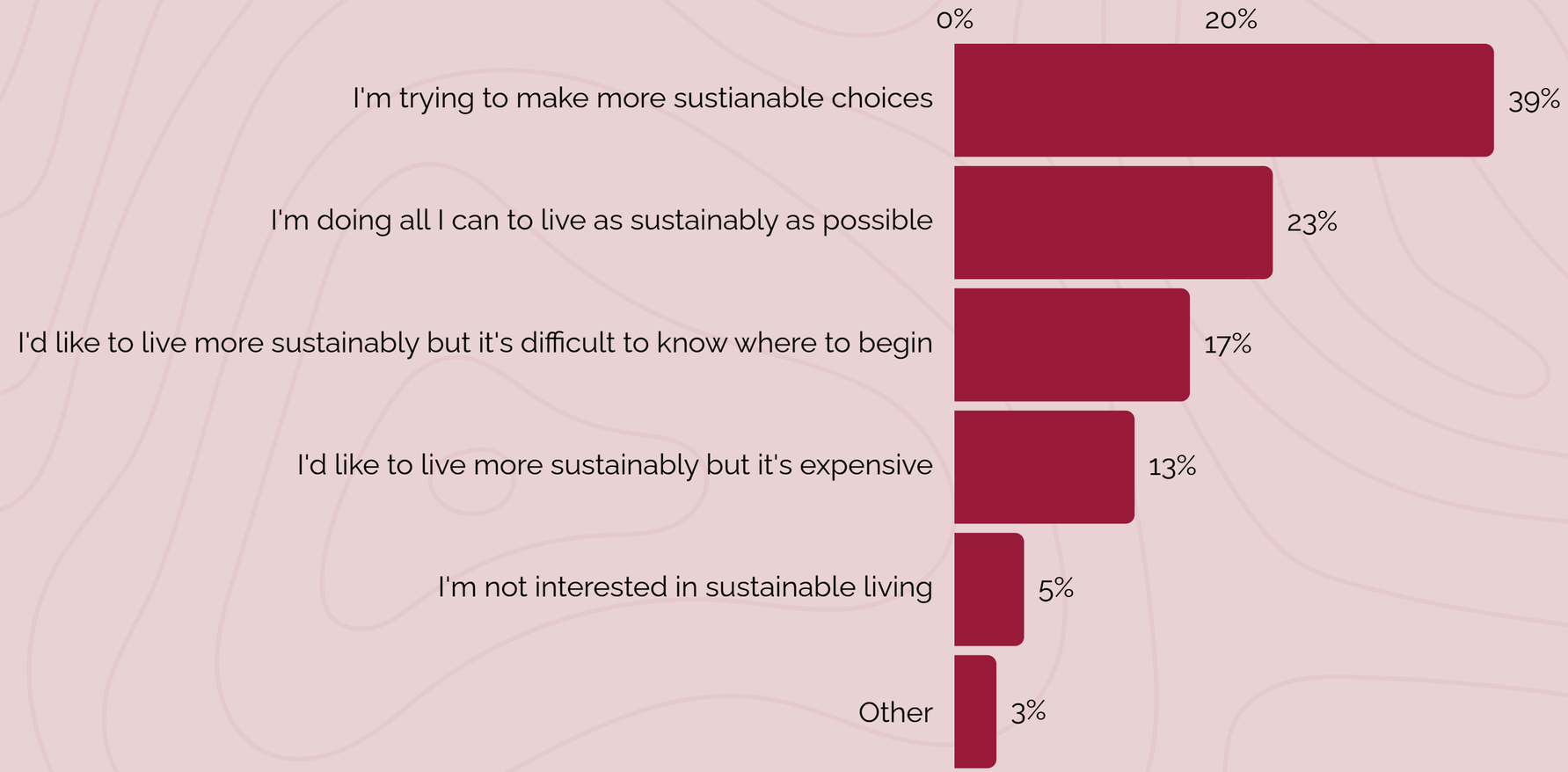


Figure 5: Description of sustainable lifestyle

Participants are concerned about the environment and 23% claim they do everything they can to live as sustainably as possible.

WHAT CONSUMERS KNOW ABOUT FASHION'S IMPACT

Given that the majority of participants express concern for the environment and 41% have purchased sustainable fashion, we sought to determine their awareness of the negative impacts of the fashion industry and how they might respond to factual information. We presented participants with five key facts (see below), followed by nine statements for them to agree or disagree with (see next page).

Surprisingly, 51% of participants reported that these facts were largely new to them, despite widespread media coverage of the industry's detrimental effects. For instance, the Canadian documentary River Blue highlights the environmental damage caused by the fashion sector (Ilvride & Rogers, 2016). Additionally, CBC Marketplace has aired episodes and published articles examining what happens to donated clothing (Matteis & Agro, 2018), the harmful chemicals found in garments (Agro et al., 2021), and the concerning reality of recycled clothing ending up in landfills (Agro & Matteis, 2023).

FACTS PRESENTED IN THE SURVEY:

The following is a list of facts about the clothing industry.

1. The clothing and textiles industries are responsible for approximately 20% of global industrial waste water
2. Canadians throw away about half a million tons of clothing annually.
3. Less than 1% of our unwanted clothing is recycled into new garments.
4. Many garment workers regularly work 14-18 hours a day, six days a week, in conditions that are unsafe and even hazardous.
5. 35% of the plastic that is polluting our oceans comes from the microfibers that are shed every time we wash synthetic clothes

Figure 6: Survey Infonode: Facts Presented in the Survey

While the information we provided is publicly available, Table 6 shows that 69% of participants stated these facts prompted them to rethink the clothing industry as a whole, and 68% felt differently about their own clothing purchases. Alarmingly, 19% of participants expressed skepticism about the truth of these facts. This highlights a significant need for consumer education and suggests that brands, NGOs, and governmental organizations cannot assume that consumers are fully informed about industry practices or capable of making well-informed choices.

Table 6: Reactions to fashion industry facts

Response	Percentage of responses with yes
These facts make me think differently about the clothing industry	**69%**
These facts make me think differently about the clothes I buy and wear	**68%**
These facts make me want to learn more about the sustainability practices of the companies I purchase from	**67%**
These facts make me angry	**61%**
These facts shock me	**61%**
These facts are horrible, but to improve the situation is not within my reach	**53%**
These facts do not surprise me; I already knew many or all of these facts	**49%**
These facts don’t really bother me	**28%**
I don’t believe that these facts are true	**19%**

We then asked participants what they believe happens to donated clothing that doesn’t sell locally. To gauge their perceptions, we provided six possible responses and requested a yes or no answer for each. The results, displayed in Table 7, reveal some intriguing insights.

Table 7: What consumers believe happens to donated clothing

	Percentage of responses with yes
They are sold overseas	25%
They are sent to landfill in Canada	25%
They are sent to landfill located in remote countries, often in developing nations	25%
They are distributed to community shelters in Canada	46%
They are recycled into new textile products	30%
I don’t know	25%
Other	1%

Participants were evenly divided into four distinct groups regarding the fate of unsold clothing: those who believe it is sold overseas, those who think it ends up in Canadian landfills, those who assume it is sent to landfills in remote or developing nations, and a group that simply stated, "I don’t know." This distribution highlights a significant knowledge gap concerning the flow of unwanted garments and underscores the need for greater transparency and education about what happens to donated clothing.

It’s surprising that 46% of participants believe unsold merchandise is distributed to community shelters within Canada. While this response reflects an idealistic view, it does not align with the reality of how clothing donations are typically handled. Although some charitable organizations do support those in need, this is not the standard practice. Most charities primarily collect used clothing to fundraise for their missions, which can vary widely. Furthermore, many collectors are for-profit entities with little to no commitment to supporting shelters or social causes. This belief may stem from a hopeful perspective rather than an accurate understanding of the situation.

Additionally, the fact that 30% of participants think the material will be recycled indicates a potential overestimation of current clothing recycling practices, which are still in their infancy. Many municipalities, charities, and thrift retailers use the term "recycling" to describe their operations, but in reality, they are often reusing or reselling items. This misuse of terminology can be viewed as a form of greenwashing, designed to encourage consumer donations by presenting a more environmentally friendly image than is warranted.

ECO VS SUSTAINABLE: DO LABELS SHAPE CONSUMER CHOICES?

DEFINITION: ECO FASHION

The term "eco-fashion" emerged in the late twentieth century to represent the movement toward offering consumers more ecologically and socially responsible clothing choices (Pookulangara & Shephard, 2013). However, the lack of a clear definition allows companies to label themselves as "eco" even if they implement only a single environmentally friendly practice. This contrasts with the Sustainable Development Goals (SDGs), which emphasize the need for a balanced consideration of both environmental and social factors. We aimed to investigate which term—eco or sustainable—participants recognize more frequently and whether they have purchased clothing labelled as such.

Given that 77% of participants are somewhat or extremely concerned about the environment, with 23% actively doing everything they can to live sustainably and 39% making more sustainable choices, we aimed to explore how these concerns and behaviours influence their awareness of and purchasing decisions regarding clothing labelled as eco-friendly or sustainable fashion.

Of the 2,000 participants, about half recognized the terms "eco" and "sustainable" fashion, with both terms being equally acknowledged. Among those who are familiar with these concepts, only 825 participants reported purchasing clothing labelled as sustainable, while even fewer—384 participants—had bought items described as eco-friendly (see Figure 7). To clarify, only participants who recognized eco or sustainable fashion were asked about their purchasing behaviour, indicating that approximately 41% of all participants have bought sustainable fashion and were aware of it. This percentage could be even higher if some participants purchased sustainable items without recognizing them as such.

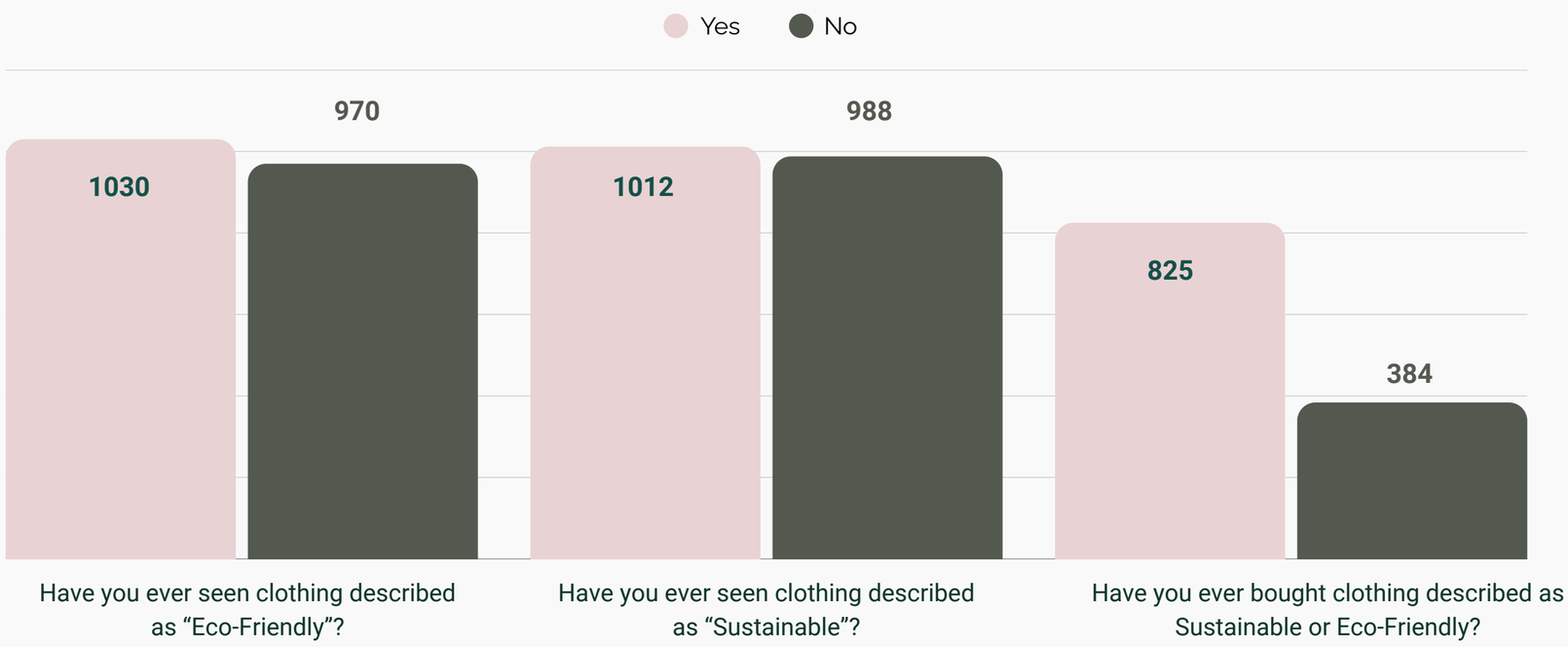


Figure 7: Have people seen and bought clothing described as eco-friendly or sustainable?

80% of participants who have purchased eco or sustainable fashion are motivated to do something positive for the environment.

The consumers most likely to recognize and purchase eco-friendly or sustainable products tend to be female, aged up to 54 years, and possess higher incomes. While we don't have data on the exact number of sustainable garments each participant bought, the fact that 41% have purchased sustainable fashion suggests it is no longer a niche market. However, the relatively low recognition of sustainable or eco-fashion raises important questions: Are there sufficient sustainable clothing options available? Are garments being effectively marketed as sustainable? Or are consumers simply not prioritizing sustainability when making clothing purchases?

We sought to understand how participants perceive sustainable clothing by asking them to select descriptive words from a provided list. The options included: affordable, comfortable, durable, expensive, hard to find, well made, luxury, low quality, made with natural fibres, made with organic fibres, not for someone like me, somewhat affordable, stylish, unfashionable, uncomfortable, and other. Figure 8 displays the frequency of each characteristic mentioned, ranked from the most frequently cited to the least.

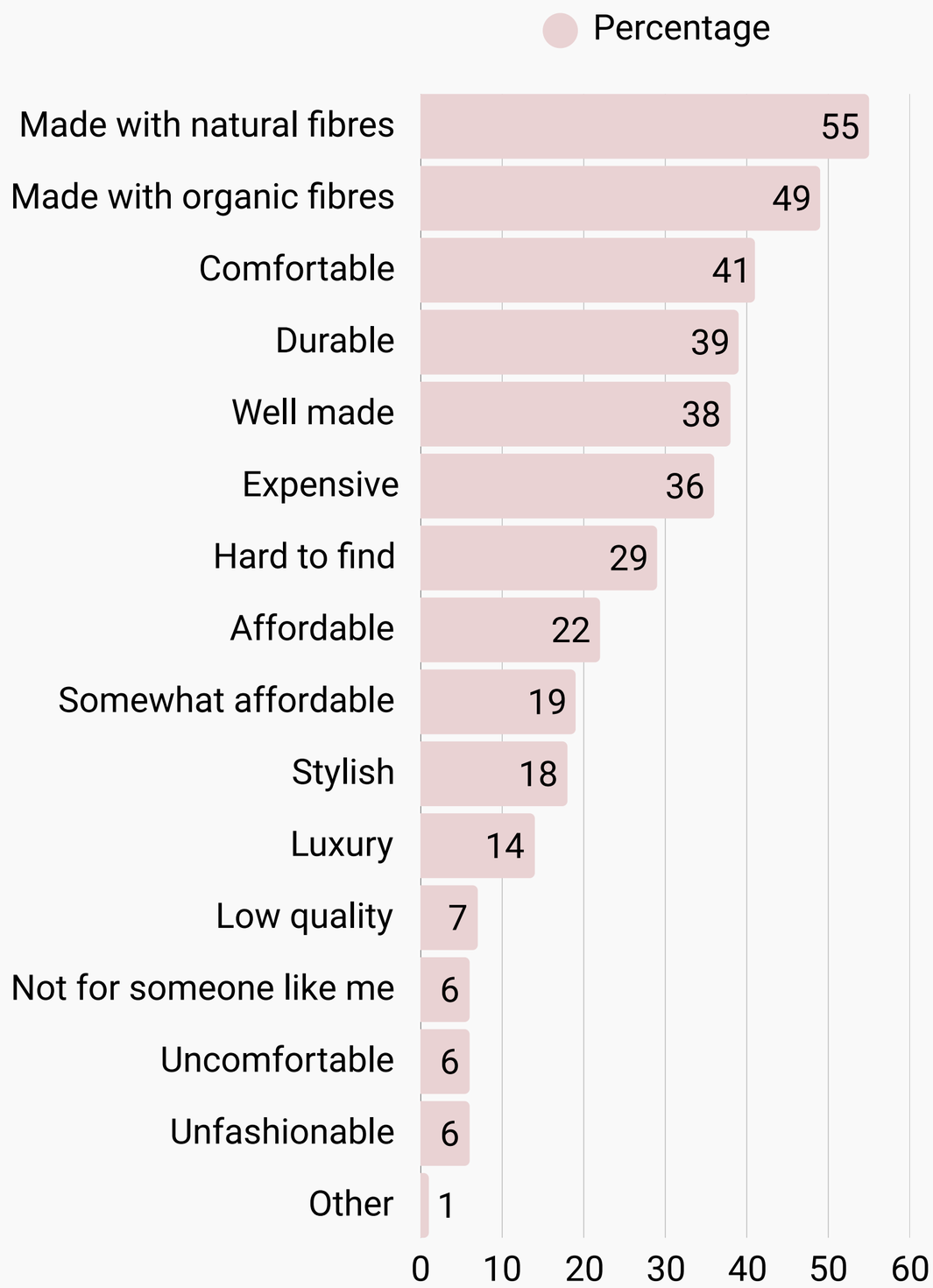


Figure 8: How consumers describe sustainable fashion

While 36% of participants perceive sustainable fashion as expensive, 22% consider it affordable. The notion that sustainable fashion lacks style has diminished, with only 6% of respondents viewing it as unfashionable. Instead, sustainable clothing is often seen as comfortable (49%) and durable (39%). These perceptions are closely tied to the materials used; natural fibres, particularly cotton, are valued for their softness and pleasant feel, distinguishing them from synthetic fibres. Additionally, natural fibres are breathable, promoting air circulation and moisture absorption, which helps regulate temperature—keeping individuals cool in warm conditions and dry in humid environments. However, approximately one-third of participants express difficulty in finding sustainable fashion, a sentiment that is not surprising given the prevalent use of polyester and other synthetic materials in the market. We examined the motivations of participants who have purchased clothing labelled as eco-friendly or sustainable. The primary reasons for their purchases included a sense of moral responsibility (80%) and concern for the environment (80%), closely followed by a belief in supporting fair wages for workers (78%) (see Figure 9).

Participants associate "eco-friendly" or "sustainable" fashion primarily with natural fibres (55%) and organic fibres (49%).

Of the 1,209 participants who bought eco or sustainable fashion, around 80% (1,012 individuals) were driven by a desire to make a positive environmental impact. However, it's noteworthy that not all participants who expressed concern for the environment (1,540 out of 2,000) recognize or choose to purchase sustainable fashion.

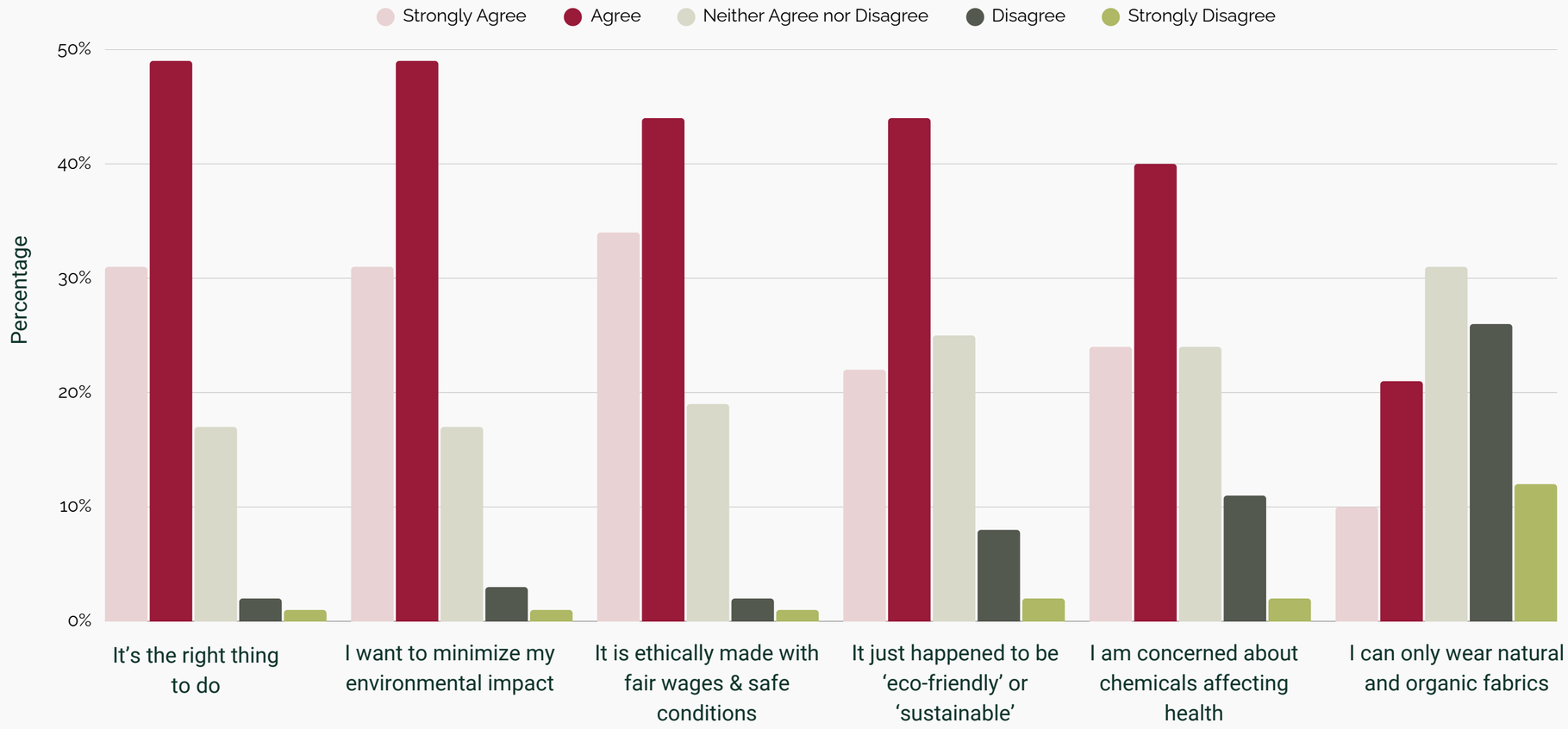


Figure 9: Reasons for buying eco-friendly and sustainable clothing

FASHION BUYING DECISIONS: WHAT MATTERS MOST?

We discovered that consumers often do not recognize eco or sustainable fashion, prompting us to explore participants' priorities when selecting clothing. As shown in Figure 10, comfort ranks as the most important factor for 99% of participants, followed closely by fit and price (96%). Style (87%), fabric type (85%), fair treatment of garment workers (69%), environmental impact (58%), brand name (55%), and "Made in Canada" (46%) follow in importance.

The emphasis on comfort as the top criterion, even above price, highlights the lasting influence of the pandemic on consumer preferences. This finding is particularly striking given that many consumers have experienced worsening financial conditions over the past two years, with rising costs impacting their disposable income.

Post-pandemic, comfort is the top priority for garment selection, surpassing even price.

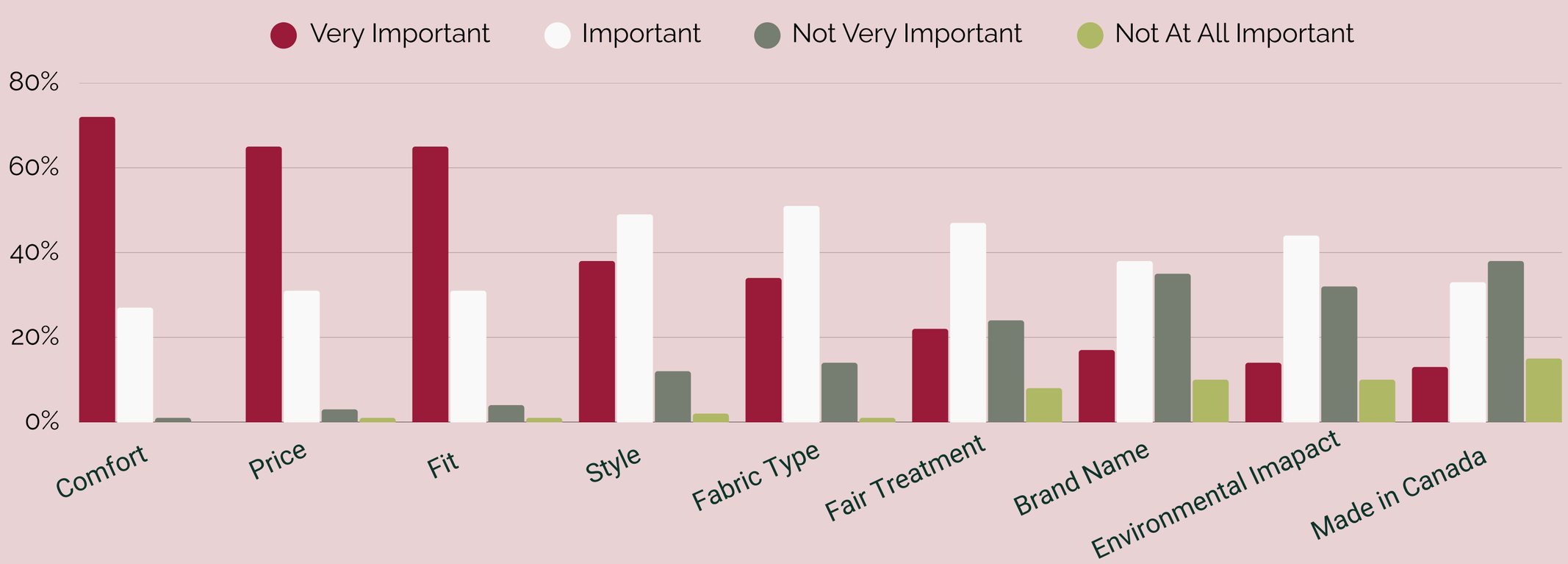


Figure 10: Consumer priorities when shopping for clothes

Participants also identified certain factors as less important in their clothing purchases. Notably, 15% of respondents considered "Made in Canada" to be "not at all important," followed by brand name and environmental impact at 10% each, and fair treatment of workers at just 8%.

Overall, comfort, price, fit, and style ranked higher as "very important" than environmental or social criteria. However, these issues still matter: 14% rated environmental impact as "very important," while 22% felt the same about the fair treatment of workers. This suggests a two-step evaluation process: participants first assess if a garment meets their physical requirements before considering its sustainability. They are unlikely to buy a garment that is eco-friendly but fails to meet their comfort or fit standards (see Figure 10).

In total, 69% of participants stated that fair treatment of workers is "very important" or "important," and 46% rated "Made in Canada" as such. This highlights the significance of labour issues in clothing choices and underscores the relevance of Canada's Modern Slavery Act (Bill S-211), which addresses forced and child labour in supply chains, playing a crucial role in protecting human rights.



This image was AI-generated and may contain approximations or artistic interpretations.

WHAT DRIVES CLOTHING PURCHASES?

Next, we sought to identify the factors that influence clothing purchases. Figure 11 indicates that street fashion and in-store merchandise displays have the greatest impact on purchasing decisions.

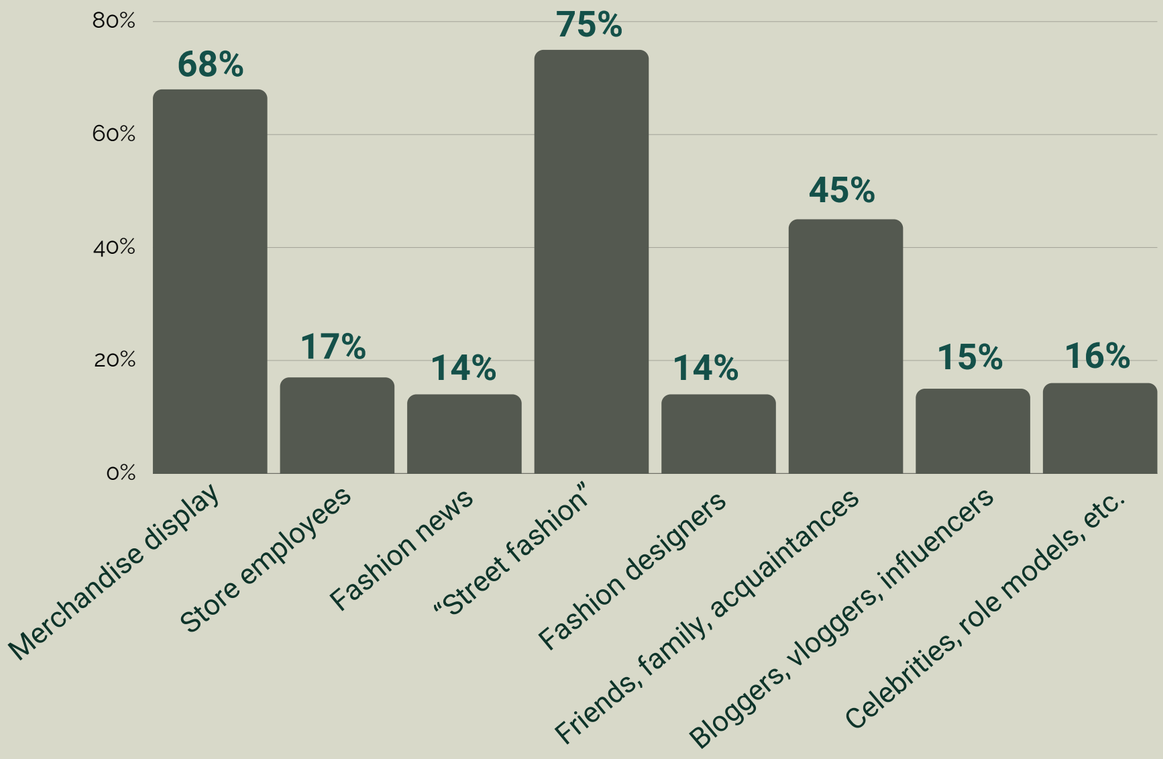


Figure 11: Influential factors in clothing purchases

We further probed to find out if the same factors influence participants across all demographics and to the same degree, and we discovered that older age groups are significantly more influenced by the merchandise displays. In comparison, younger age groups are more influenced by sales staff, fashion media, street fashion, fashion designers, family and friends, bloggers, vloggers, influencers, and celebrities.

However, 68% of all participants claim that they are influenced by the merchandise they see while they are shopping. This presents an opportunity for brands to influence consumers' decisions to purchase sustainable options. To do this, however, sustainable offerings must be made more visible in stores by increasing the number of sustainable garments available, working with eco-certification labels, or positioning the more sustainable options in more prominent places.

Brands can sway purchasing decisions by making sustainable fashion options more visible in store displays.

MINIMIZING FASHION'S FOOTPRINT

We wanted to understand whether participants actively try to reduce the environmental impact of their clothing purchases and what specific actions they take. The results in Figure 12 reveal that 38% of participants are making efforts to minimize their impact, while 18% report that they are doing everything possible to achieve this. Overall, more than half of the respondents are committed to reducing the environmental footprint of their clothing.

56% of participants try or do everything they can to reduce their fashion footprint.

However, 16% of participants expressed uncertainty about how to reduce their impact or where to begin, while 10% admitted they had never considered the issue. This highlights a clear need for consumer education to inform individuals about practical steps they can take to minimize their environmental footprint and care for their clothing more effectively.

There is a pressing need for consumer education to help individuals reduce their fashion footprint.

The results indicate a significant positive correlation between efforts to minimize the impact of clothing and environmental concerns: individuals who are more environmentally conscious tend to make greater efforts to reduce their fashion footprint.

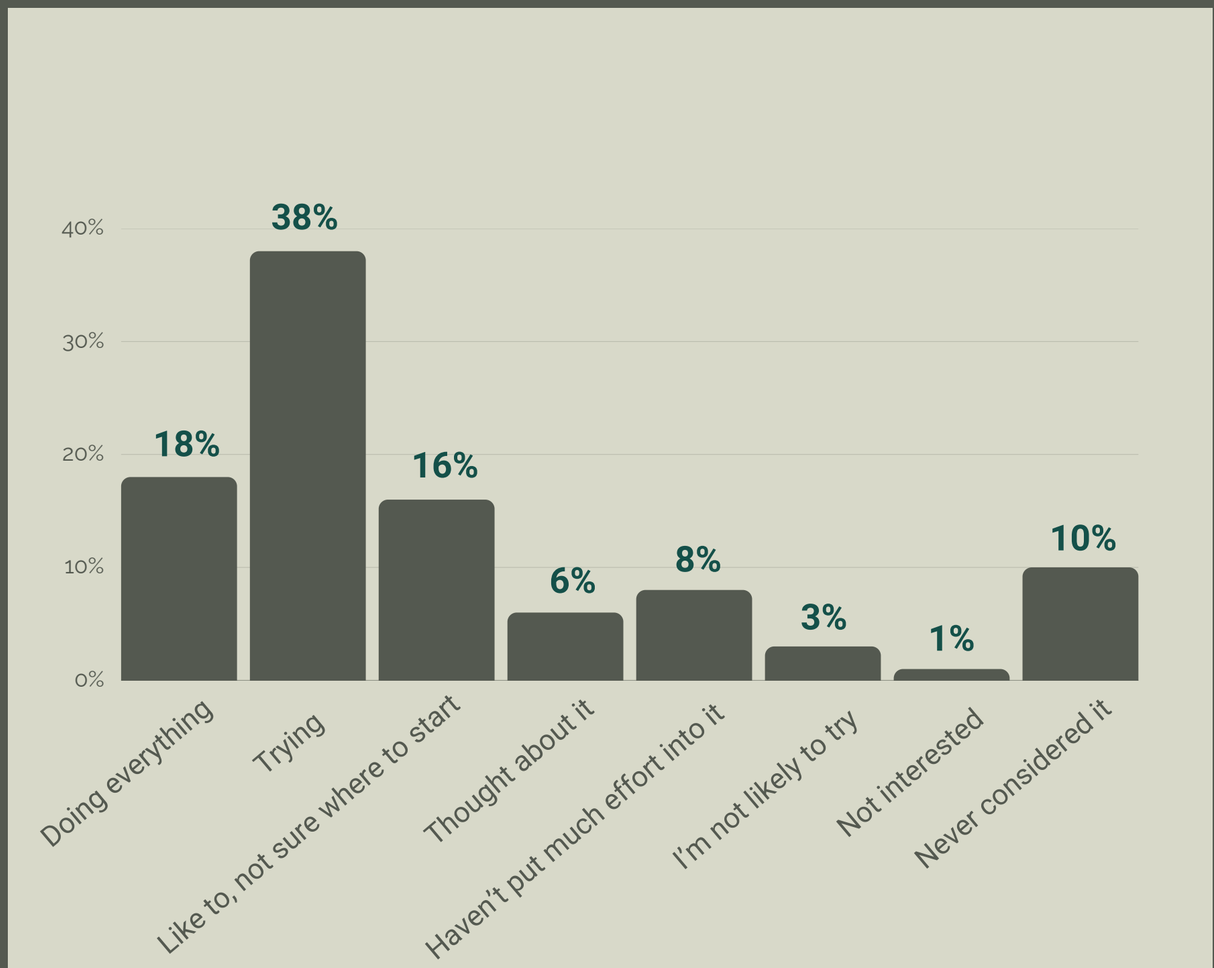


Figure 12: Efforts to reduce the impact of clothing

FASHION & THE CIRCULAR ECONOMY

Circular economy leader Walter Stahel defines a circular system as one that involves reusing what we can, recycling what cannot be reused, repairing what is broken, and remanufacturing what cannot be repaired (Stahel, 2016, p. 435). To achieve this, products must be intentionally designed to be reusable, repairable, or recyclable. This concept, known as design for a circular economy, emphasizes durability, ease of repair, and recyclability.

For example, consider a winter coat. To enhance its recyclability, it's best to use a single material, such as polyester, for the outer fabric, padding, and lining—this is referred to as “mono-material” design. This approach simplifies the recycling process by eliminating the need to separate different materials, making recycling more efficient and cost-effective. However, this strategy is only viable if a robust recycling system is in place, including the collection of unwanted garments and the infrastructure to recycle polyester into new products.

When a garment is recycled back into fibre, yarn, and fabric to create a new item, this is called closed-loop recycling. In contrast, open-loop recycling, or down-cycling, involves shredding the garment into lower-value products, such as insulation. Currently, the fashion industry operates far from a circular model, with garments typically being purchased, used, and discarded rather than recycled into new clothing. Transitioning to a circular system is essential for reducing the environmental impact of the fashion industry.

While purchasing sustainably made clothing is one way to reduce our fashion footprint, consumers can also engage in circular practices such as donating unwanted clothes and repairing items to extend their lifespan. We asked participants who are making an effort to reduce their impact about their actions. Figure 13 illustrates the frequency of these behaviours among respondents.

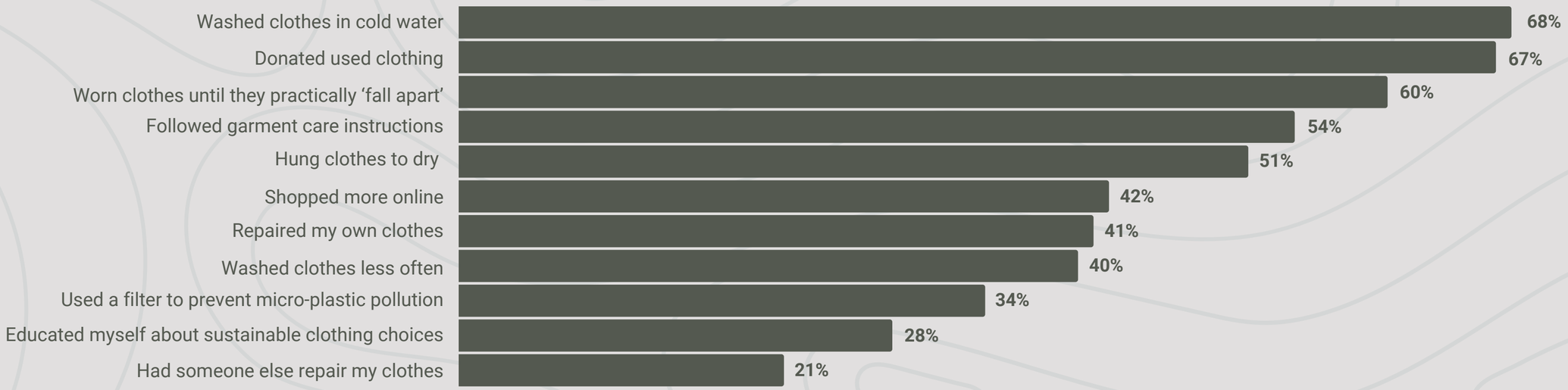


Figure 13: Frequency of Actions Taken to Reduce Environmental Impact

The results show that 68% wash their clothes in cold water, 67% donate used clothing, and 60% wear their garments until they fall apart. However, some actions are less common: only 21% have someone else repair their clothes, 28% educate themselves about sustainable apparel choices, and 34% use filters to minimize microfibre shedding.

Washing with cold water and donating unwanted garments are the most common actions to reduce environmental footprints.

To achieve a circular fashion industry, addressing the end-of-life options for textiles is crucial. We asked participants what they most often do with clothes they no longer need or want. As shown in Figure 14, donating to charity is the most common practice, with 25% of respondents choosing this option. This is followed by donating to used clothing retailers (10%) and giving clothes to friends and family (9%). Seven percent drop off garments at new clothing retailers. Swapping, repurposing, discarding, and selling clothes are less common, each practiced by only 4% of participants. Notably, individuals under 45 are more likely to sell and swap their clothing compared to older participants.

25% of participants always donate their unwanted garments

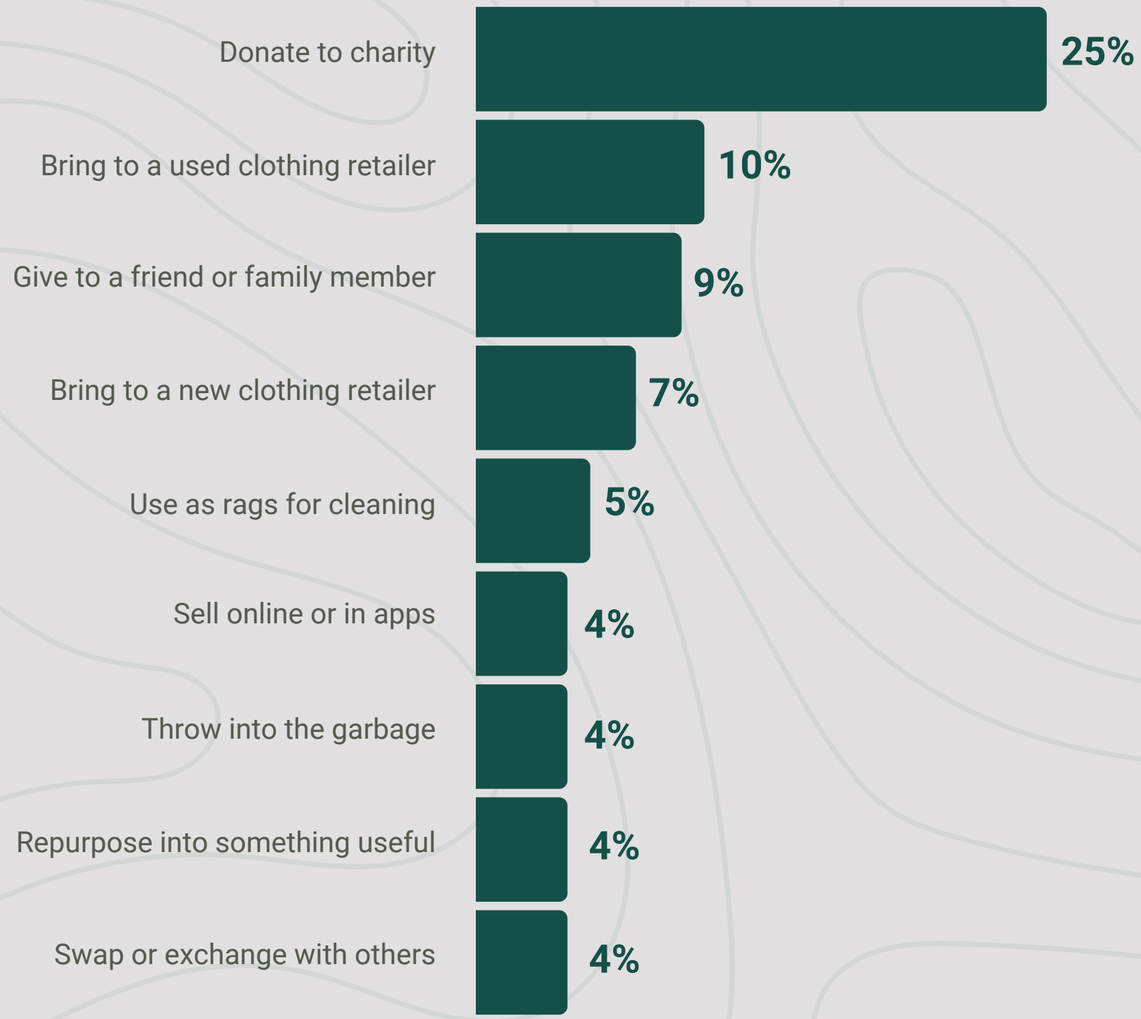


Figure 14: Pathways for Unwanted Clothing

Donating used clothes is a social norm in Canada. In a study conducted in Ontario in 2015, Weber found that nearly 92% of participants knew where to donate their unwanted clothes. Only 9% declared that they had never thought about doing something else with their unwanted garments besides throwing them in the garbage (Weber, 2015).



The most common action taken by participants with their unwanted clothes is to donate them. To explore this further, we examined how many participants had never donated their garments. Figure 15 illustrates this trend: 25% always donate their unwanted clothes, 40% often, 25% sometimes, 6% rarely, and 4% never. Notably, this Canada-wide survey, with a significantly larger sample size than the Weber study, reveals a positive trend: the percentage of participants who *never* donate their used clothes has decreased from 9% to 4%.

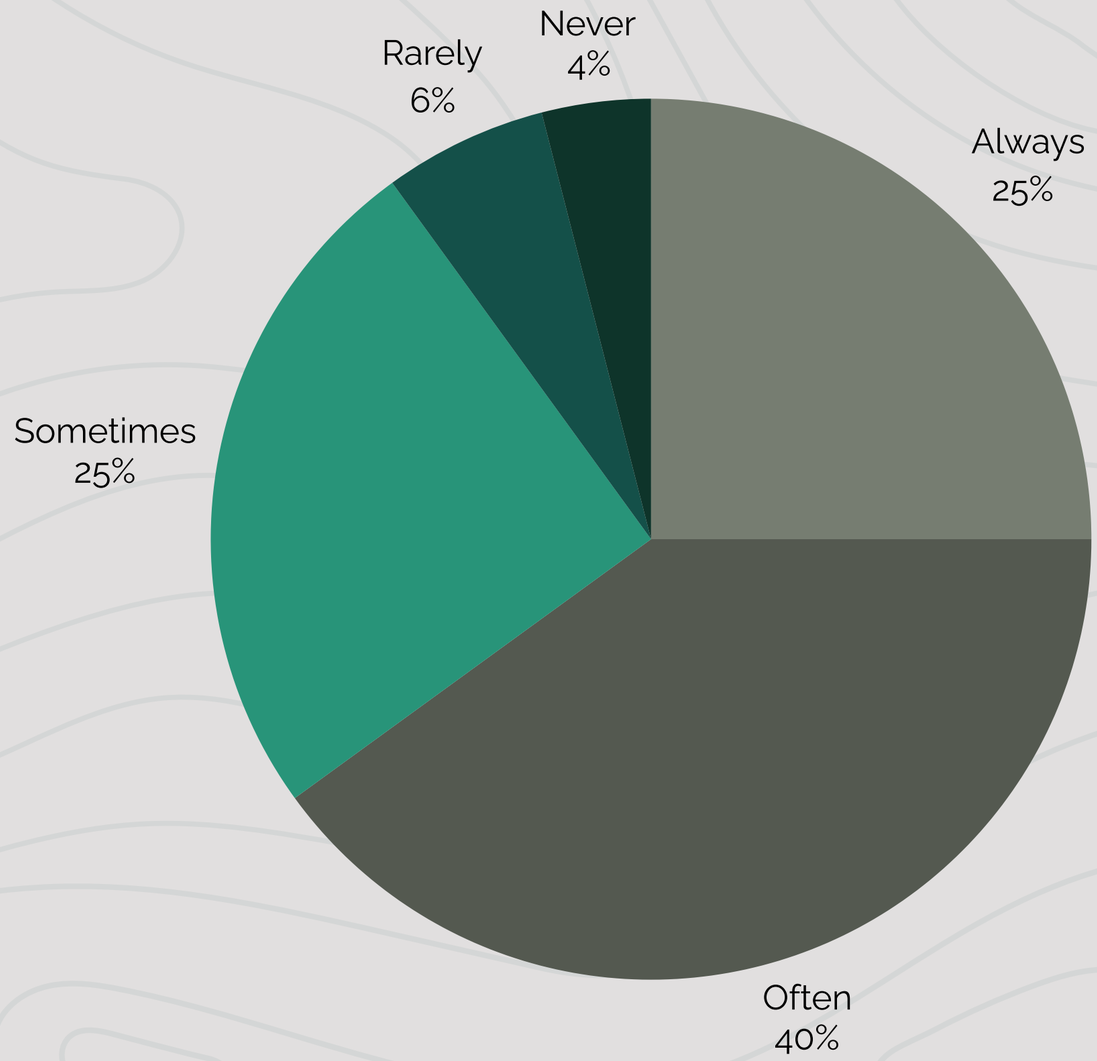


Figure 15: Frequency of donating unwanted clothes

IN FOCUS:

INDIGENOUS PERSPECTIVES ON SUSTAINABLE FASHION

Indigenous communities have long prioritized conservation and living in harmony with the environment as essential to their cultural practices. Given their deep-rooted connection to the land and resource conservation, it is essential to examine how their perspectives align with sustainable fashion trends. An ANOVA reveals that 100 Indigenous participants exhibit stronger environmental attitudes—as measured by a standardized scale (Franzen & Vogl, 2013)—compared to other heritage groups, underscoring their deep commitment to sustainability.

A Chi-square test further explores differences in awareness of eco-friendly and sustainable clothing between Indigenous and non-Indigenous participants. Findings indicate that Indigenous individuals, including those living primarily on-reserve, encounter sustainable clothing more frequently than anticipated. Interestingly, individuals in remote areas—regardless of heritage—also report greater exposure to sustainable clothing and higher-than-expected purchasing rates.

When it comes to motivations for buying sustainable clothing, Indigenous participants are particularly concerned about the health impacts of chemicals used in production, especially for themselves and their children. They also prioritize fair wages and safe working conditions for garment workers. However, many note that an eco-friendly label alone is not necessarily their primary reason for purchasing a garment.

While Indigenous participants engage in many of the same sustainable clothing practices as others—such as donating used garments and preventing microplastic pollution—they are more proactive in reducing their wardrobe's environmental impact. They are more likely to ask others to repair their clothes, wash clothes less frequently and air-dry them, educate themselves on sustainable fashion choices, and wear garments until they fall apart. However, they report less engagement in repairing their own clothes compared to other participants.

Indigenous participants also tend to trust companies' sustainability claims but recognize greenwashing as a significant issue in Canada's consumer market. Interestingly, their ability to identify greenwashing practices and knowledge of eco-labels is comparable to other groups, suggesting similar levels of skepticism and awareness.

Notably, Indigenous participants shop online more frequently, which may increase access to sustainable fashion, particularly in remote areas. However, their challenges in identifying misleading sustainability claims raise concerns about the true environmental impact of the garments they purchase. This underscores the need for stronger consumer protections, ensuring that Indigenous communities—who are deeply committed to sustainability—have the necessary tools to verify eco-friendly claims in fashion.

IN FOCUS:

TACKLING MICROFIBRE WASTE

Microfibres can originate from both natural and synthetic fabrics, but the primary concern revolves around microplastics released from synthetic garments. These microplastics, defined as tiny plastic particles less than 5 mm in length, are shed during the washing process. Unfortunately, conventional sewage treatment systems are not equipped to filter out these particles, allowing them to enter local waterways and eventually the ocean, where they pose a threat to marine life and can re-enter the food chain, affecting human health (Somers, 2020).

As awareness of the environmental impact of microfibres grows, consumers may seek ways to mitigate their own contributions to this problem. One emerging solution is the use of laundry filters or washing bags designed to capture these microfibres during laundering. While these products vary in name, their purpose remains the same: to trap microfibres in a mesh, preventing them from entering wastewater. However, no filter currently guarantees 100% efficacy in capturing all microfibres.

A leading example of this technology is the GuppyFriend bag. A CNN review highlighted its effectiveness in capturing a significant quantity of fibres, yet it also noted a critical challenge: the disposal of the collected microfibres. As Kirts (2023) points out, the current recommendation is to seal the trapped fibres in a container and dispose of them with household waste, which at least prevents their release into the environment. This solution is described as a "lesser of two evils" until broader industry changes are made (Kirts, 2023). Some experts, including ecologist Mark Anthony Browne, raise concerns that the added consumerism associated with purchasing such bags may ultimately negate their environmental benefits.

In summary, while laundry bags represent a promising first step in reducing microfibre pollution, their effectiveness hinges on developing innovative strategies for the responsible disposal of collected fibres.

IN FOCUS:

THE ONLINE SHOPPING MYTH: A HIDDEN ENVIRONMENTAL TOLL

Consumers may perceive online shopping as a more environmentally friendly option, reasoning that bypassing physical retail stores reduces overall emissions. Indeed, a study by Weideli (2013) from MIT's Center for Transportation & Logistics found that traditional shopping has twice the carbon footprint of online shopping.

However, this perspective overlooks the current realities of online shopping. The prevalence of "rush" and "same-day" delivery creates inefficiencies, often leading to trucks operating at half capacity (Igini, 2024). Moreover, return rates differ significantly: approximately 30% of online purchases are returned compared to just 9% for in-store purchases (Saleh, 2024). This high return rate contributes to a greater transportation footprint, with many returned items ending up in landfills rather than being resold (Constable, 2024).

Additionally, the environmental impact of packaging for online orders cannot be ignored. Each year, 86 million tons of plastic packaging are produced, with less than 14% being recycled (Igini, 2024). Canadian environmental NGO Canopy (2024) reports that around 3 billion trees are used annually for cardboard shipping cartons.

Collectively, these factors can negate any environmental benefits associated with online shopping. The environmental advantages of online retail only hold when conditions mirror those of traditional shopping—such as lower return rates, longer shipping times, and minimal packaging. When today's online shopping demands come into play, those benefits largely diminish.

GREENWASHING: A SERIOUS ISSUE FEW CAN NAME

Before assessing participants' ability to recognize greenwashing, we first asked if they were familiar with the term. Surprisingly, nearly 75% of respondents reported not knowing what greenwashing means (see Figure 16). We also examined whether awareness differed between French and English Canadians and found no significant variation; the only factor influencing understanding was education level, with more educated participants indicating greater familiarity with the term.

After providing a general definition of greenwashing, we asked participants if they believed it was a serious issue among consumer goods companies, which included food, personal care products, home care items, clothing, and automobiles. Figure 17 illustrates that 49% of participants view greenwashing as a serious issue, with 15% considering it very serious.

Only 26% of participants were familiar with the term greenwashing.

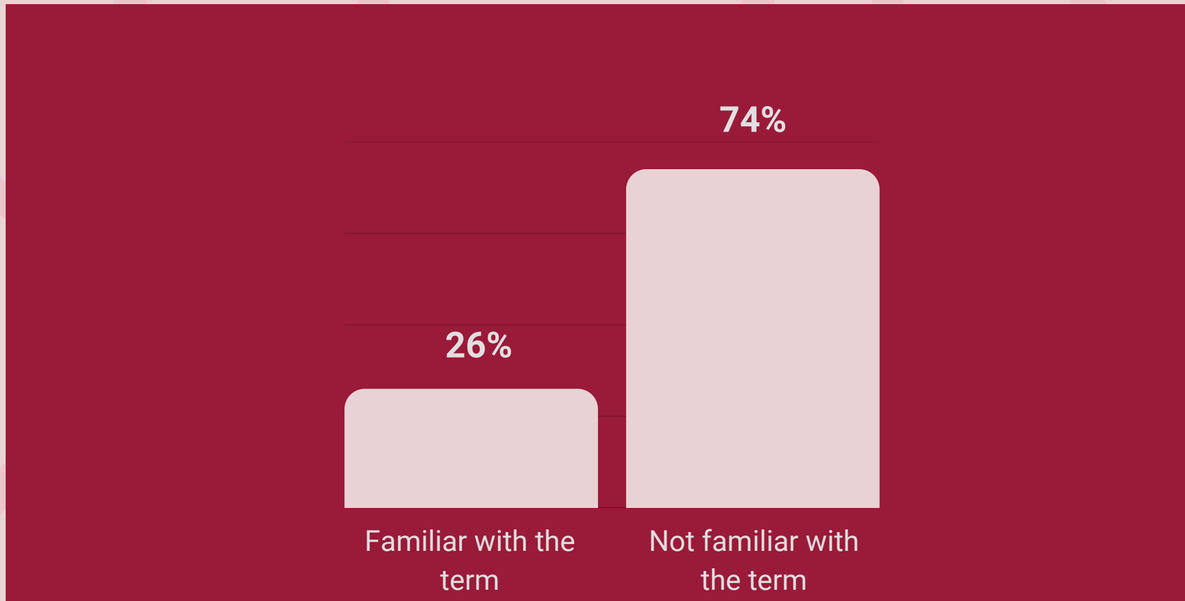


Figure 16: Familiarity with the term greenwashing

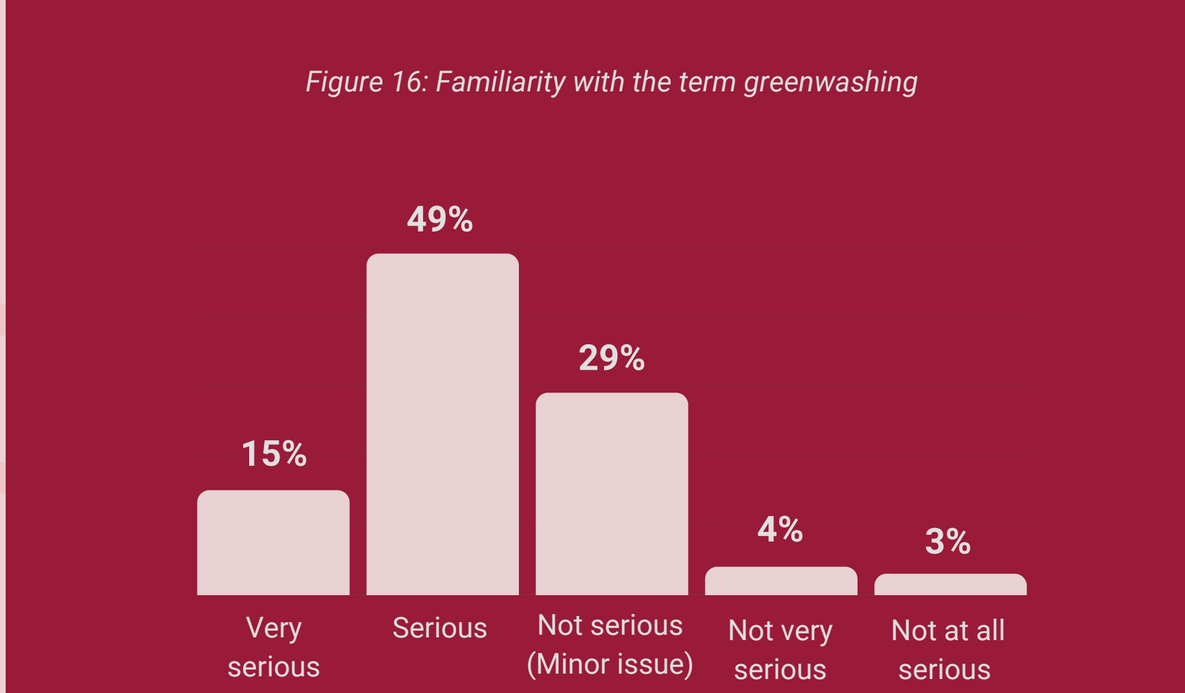


Figure 17: Greenwashing is a serious issue

To gauge the impact of greenwashing on participants, we asked how much it upsets them. A striking 79% expressed frustration, with 26% deeply bothered, 33% somewhat affected, and 21% mildly concerned. In contrast, only 20% reported little to no concern (see Figure 18).

French Canadians, women, younger individuals, and those with higher education levels are more likely to view greenwashing negatively, highlighting a growing skepticism toward misleading sustainability claims. This suggests that consumers are not only paying attention but also experiencing genuine frustration when confronted with deceptive branding.

For the industry, this is a critical wake-up call: greenwashing is not just a minor inconvenience or marketing misstep—it undermines consumer trust and damages brand credibility. As sustainability becomes a key driver of purchasing decisions, companies must recognize that authenticity and transparency are non-negotiable.

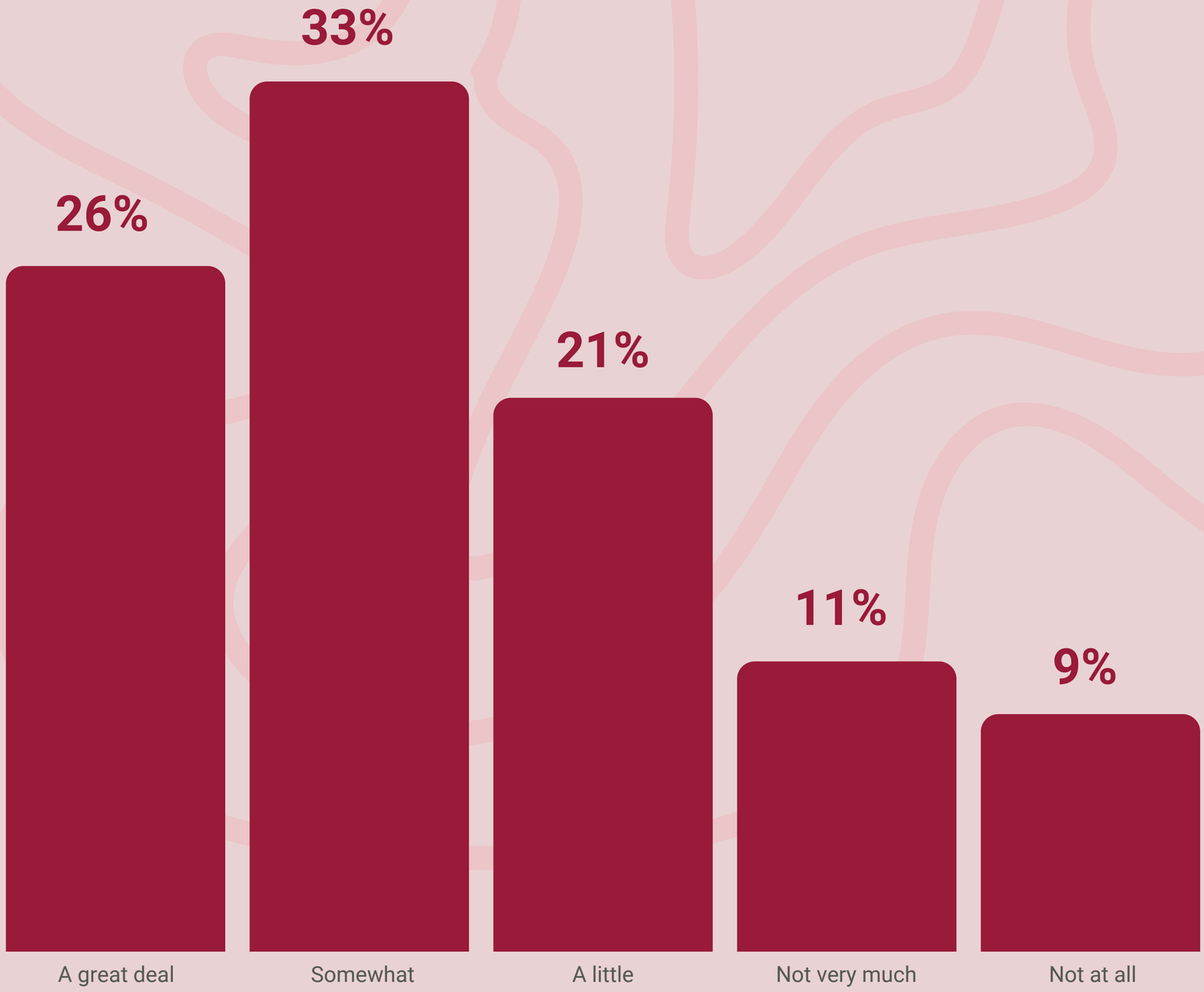


Figure 18: The degree to which greenwashing bothers participants

UNDERSTANDING THE PREVALENCE OF GREENWASHING CLAIMS

To evaluate how widespread greenwashing is and identify the most commonly encountered claims, we asked participants to share their experiences with these deceptive marketing tactics. Table 8 presents a range of greenwashing examples, and respondents were asked to indicate how often they come across each one, selecting never, sometimes, occasionally, frequently, or very frequently.

This approach allowed us to quantify consumer exposure to misleading sustainability claims, shedding light on which greenwashing tactics are most pervasive and which may be losing consumer trust. The findings provide valuable insights for both brands looking to build credibility and policymakers aiming to regulate deceptive marketing practices.

Table 8: List of greenwashing claims

Used pictures of nature (and/or use earthy colours) to imply they're sustainable - but didn't explain how.
Used 'buzzwords' without offering proof.
Made sweeping statements like 'We want to save the planet' or 'This is a more sustainable garment' without providing detail.
Were vague about what 'good' they actually do.
Promoted one small thing the brand was doing (e.g. used recyclable packaging) but ignored how the product impacted the environment or people in other ways.
Exaggerated their environmental practices.
Used endorsements from 'green' influencers or celebrities instead of explaining what the brand was actually doing.
Emphasized the fact that the product is "free-from" or did not contain a harmful substance - which had already been banned - and was therefore not being used in any products
Offered endorsements by 'fake' environmental organizations - that either never existed or no longer exist.

Figure 19 illustrates response frequencies for various greenwashing tactics, with the y-axis categorizing from "very frequently" to "never." Pictures of nature was the most recognized with nearly 50% having encountered it frequently or very frequently. Buzzwords without proof follows at 48%, and sweeping sustainability statements at 46%. On the other hand, the least frequently encountered claim was fake endorsements from misleading environmental organizations, with just 28% of participants saying they had never seen them.

To get a clearer picture, the average frequency of these claims was calculated on a 1 to 5 scale (1 = never seen, 5 = very frequently seen). The results (shown by the black line) reveal that all types of greenwashing claims are encountered at similar frequencies, with scores ranging from 2.7 to 3.3.

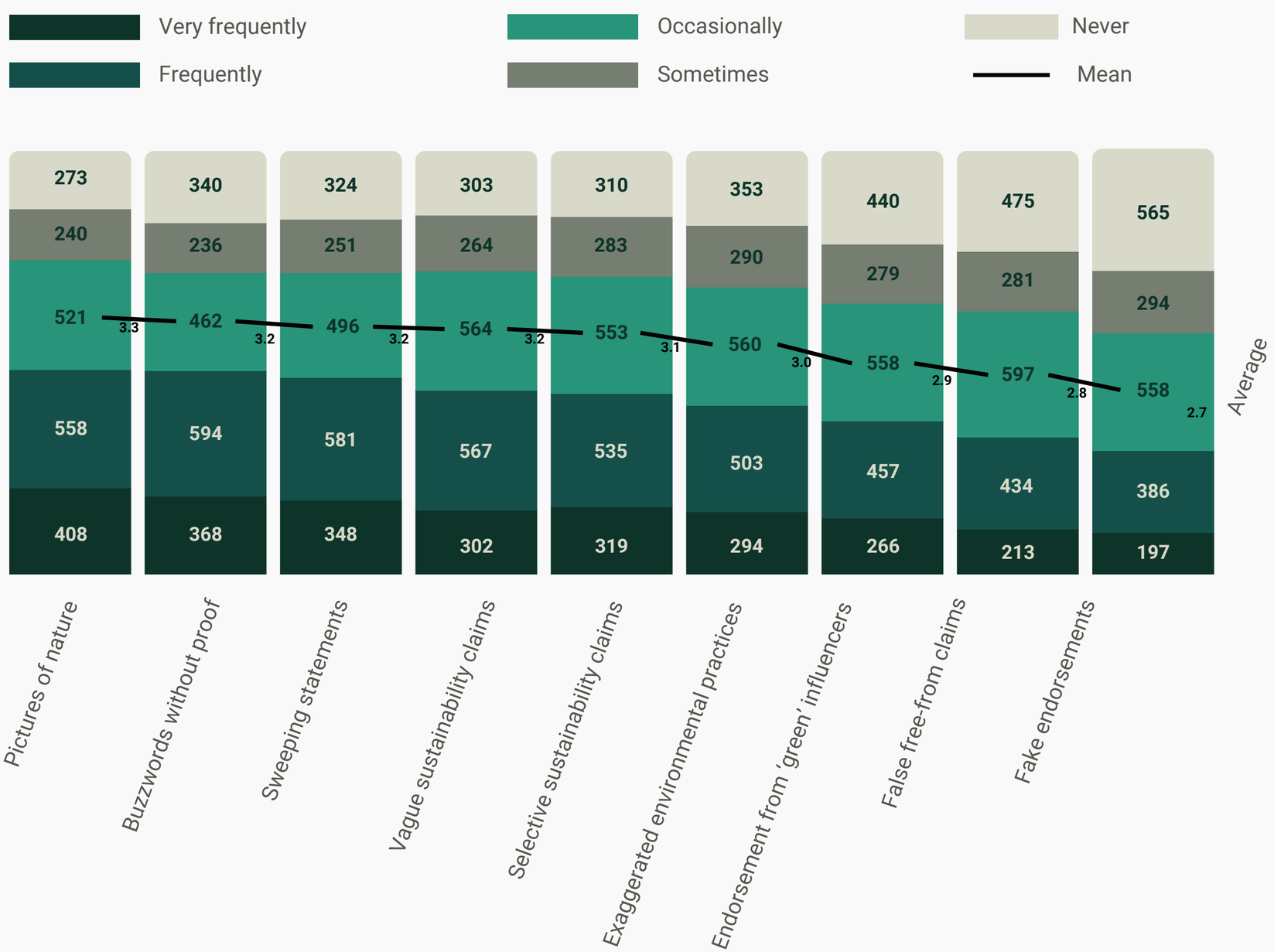


Figure 19: How often consumers encounter greenwashing tactics

The left Y-axis represents the number of responses for each frequency category (Very Frequently, Frequently, Occasionally, Sometimes, Never). The right Y-axis shows the average rating on a scale from 1 (Never) to 5 (Very Frequently).

ARE CONSUMERS FALLING FOR GREENWASHING?

While 79% of participants expressed frustration with greenwashing and saw it as a serious issue, we wanted to explore whether they had knowingly purchased products marketed with misleading sustainability claims. To analyze this, we used a dual-axis graph similar to the one in the previous section. The first y-axis (left) represents the number of participants who selected each frequency category (very frequently, frequently, occasionally, sometimes, never), while the right y-axis shows the average frequency of purchases on a scale of 1-5, ranging from “never” to “very frequently.”

Figure 20 reveals that a significant number of participants—between 574 and 813 out of 2000—reported never having bought garments promoted with environmental claims. However, some participants did purchase such items, with the average frequency of these purchases falling between 2.3 and 2.6, indicating that they bought garments associated with environmental claims occasionally.

Some consumers knowingly purchase clothing despite recognizing misleading environmental claims in its advertising.

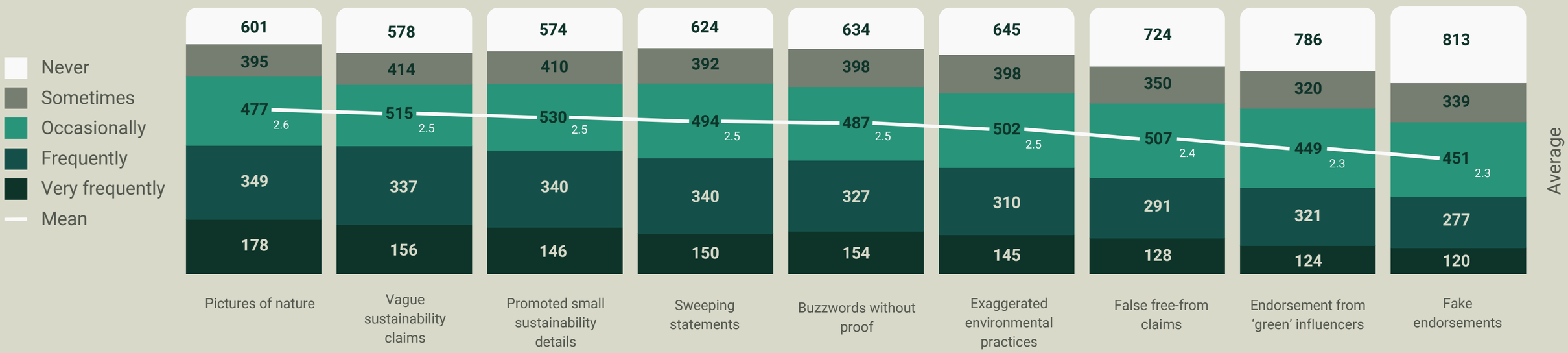


Figure 20: Buying clothing advertised with some environmental claim

The left Y-axis represents the number of responses for each frequency category (Very Frequently, Frequently, Occasionally, Sometimes, Never).
The right Y-axis shows the average rating, measured on a scale from 1 ("Never") to 5 ("Very Frequently").

GREENWASHING CULPRITS

We also asked respondents where they believe greenwashing is most prevalent in the clothing industry. According to the results in Figure 21, participants identified social media and advertising campaigns as the top sources of greenwashing. They also cited global clothing chains, online stores, fast fashion retailers, department stores, luxury fashion brands, sporting goods outlets, outdoor clothing retailers, discount stores, outlet malls, and children's clothing stores as common examples. In contrast, respondents feel that Canadian-owned boutiques, sustainable merchandise stores, small shops, Indigenous retailers, and vintage stores are the least likely to engage in greenwashing practices.

Consumers identify social media and advertising campaigns as the leading sources of greenwashing.

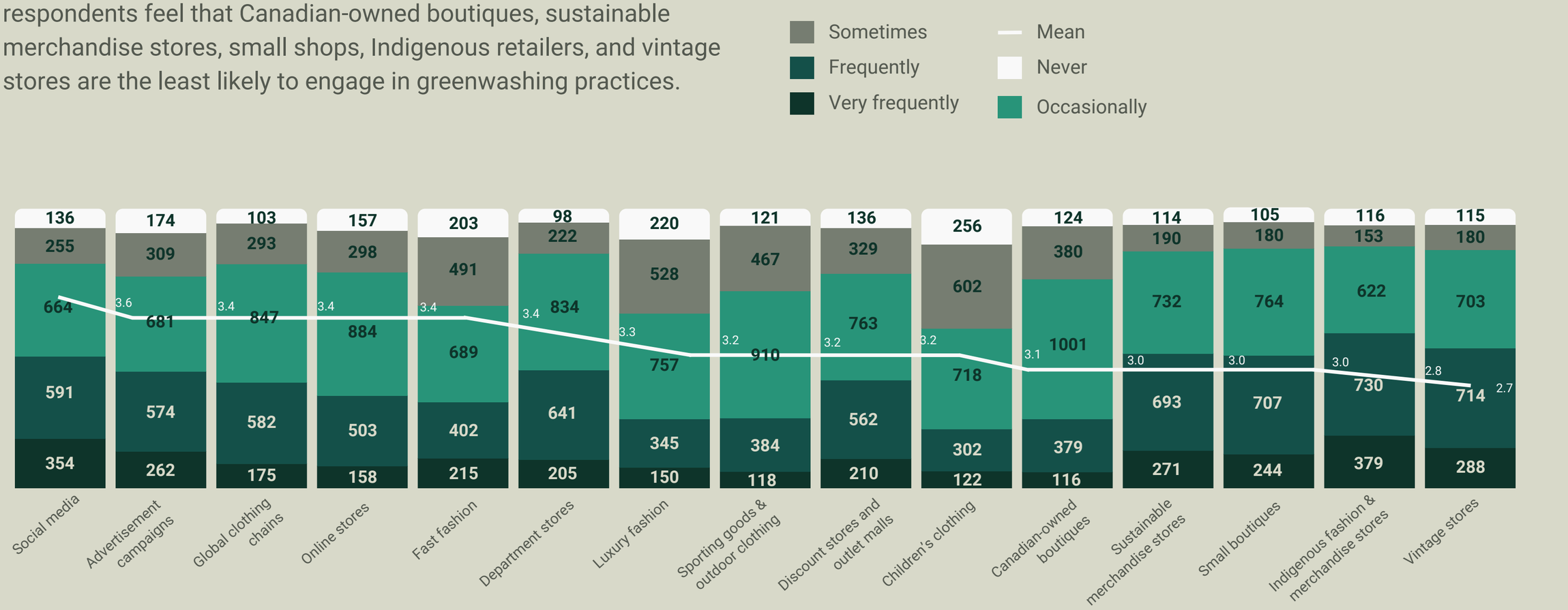


Figure 21: Perceived likelihood of greenwashing

The left y-axis represents the frequency of responses for a certain category (very frequently, frequently, occasionally, sometimes, never).
The right y-axis represents the average on a scale between 1 = Never to 5 = Always

IN FOCUS:

GREENWASHING ON THE RISE

Awareness of greenwashing in the fashion industry appears to be increasing, as consumers seek to shop consciously and align with brands that reflect their values. However, despite this growing awareness, the practice of greenwashing seems to be escalating. Interviews with industry professionals shed light on the factors driving this trend.

George Harding Rolls, Campaign Lead at Action Speaks Louder, noted that the fashion industry has recognized consumers' desire for eco-friendly options. This creates a "fertile ground" for misleading green claims to proliferate, as brands adapt to consumer preferences while often failing to deliver genuine sustainability.

Dr. Wren Montgomery from Ivey Business School highlighted the competing pressures on fashion brands. While sustainability is becoming more important, trends and low prices continue to dominate consumer motivations. This conflict makes it challenging for brands to genuinely embrace sustainable practices without sacrificing affordability or style. As a result, many opt for shortcuts, marketing products as sustainable without incurring the costs of true sustainable production.

Rachel Kitchin, Senior Corporate Climate Campaigner for Stand.earth, emphasized that brands excel in marketing rather than actual change. She noted that while greenwashing is pervasive, the fashion industry is rapidly adapting to capitalize on the demand for "sustainable" products, often prioritizing marketing over meaningful environmental impact. The rise of greenwashing is evident as brands leverage consumer desire for sustainability to create superficial marketing campaigns that ease consumer guilt.

VERIFYING SUSTAINABILITY CLAIMS

With the rise of greenwashing, consumers must navigate an overwhelming number of sustainability claims. To better understand how they determine the credibility of these claims, we examined the verification methods they rely on.

To this end, we presented a list of potential practices and asked respondents to indicate their level of agreement. As shown in Table 9, the most common strategies include reading garment labels for fibre content (73%) and manufacturing location (69%). Other methods, which may require additional research, were used by fewer participants.

Table 9: Tactics to validate sustainability

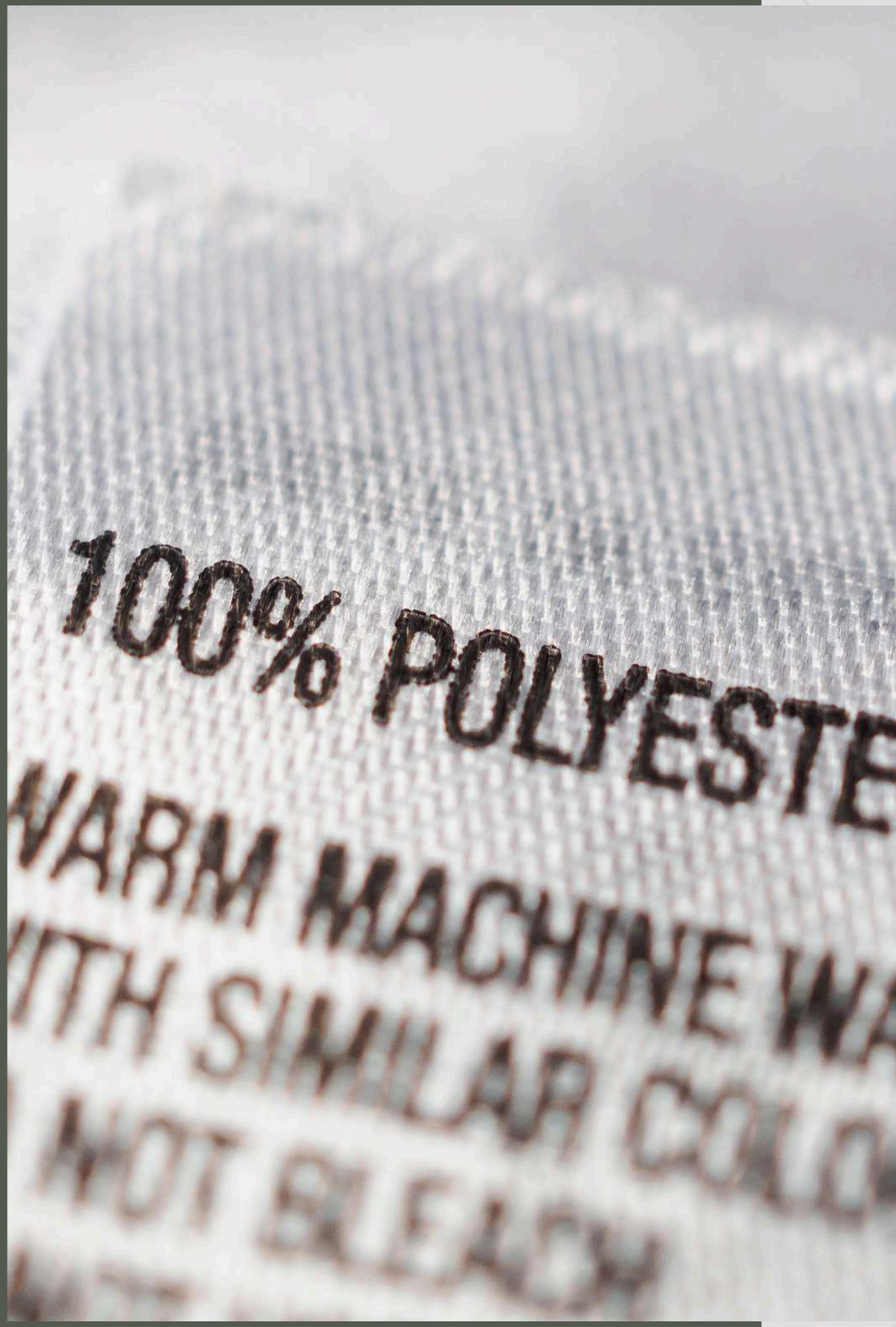
	Strongly Agree	Agree	Total
I look on the label for the materials used to make the garment	26%	47%	**73%**
I look for where the item was manufactured (that is, in what country)	26%	43%	**69%**
I check the brand's sustainability practices or try to find a sustainability report on their website	18%	39%	**57%**
I check for a symbol of certification by a third-party organization to verify the claims are true	17%	40%	**57%**
I search social media or online news sources (e.g., blogs, reviews)	18%	36%	**54%**
I check websites of environmental organizations and NGOs	18%	36%	**54%**
I look for environmental rankings or scorecards of clothing brands prepared by environmental organizations	16%	36%	**52%**
I ask somebody for their opinion (for example, a store associate, friend, acquaintance)	15%	36%	**51%**
I check the company's social media	18%	32%	**50%**
I look for comments by an expert or influencer	15%	31%	**46%**

While checking fabric composition can help identify natural versus synthetic fibres, it does not adequately reflect the social or environmental impacts associated with those fibres. For instance, cotton may be produced using harmful pesticides or exploitative labour practices. Genuine sustainability in cotton production necessitates third-party certification, meaning that simply knowing the fabric composition is insufficient for verifying sustainability claims. Notably, among the 57% of participants who check for such certifications, only 17% strongly agreed that they further verify the accuracy of these claims.

The most common way consumers verify greenwashing claims is by reading the garment label for material information.

While many consumers rely on material labels to assess a garment's sustainability, the country of origin is another factor often used as a shortcut for ethical production. Many assume that garments made in certain countries—particularly those with stronger labour laws—are inherently more ethical and sustainable. However, modern slavery and exploitative labour practices can occur anywhere, making country of origin an unreliable measure of sustainability.

For instance, California, a region often associated with fair labour practices, has been found to harbour sub-minimum wage labour and poor working conditions, particularly in its garment industry. This prompted the introduction of Bill 62 (Garment Worker Protection Act) in the U.S., which seeks to eliminate wage theft and hold brands accountable for unfair labour conditions in domestic factories.



DO CONSUMERS LOOK FOR SUSTAINABILITY CERTIFICATIONS?

To explore participants' awareness of sustainability certifications, we first examined their recognition of broader environmental labels. We focused on three Canadian eco-certifications and asked if they actively seek these symbols when shopping. About one-third of participants reported looking for these certifications, with the Canadian Organic label being the most recognized at 33%. The FSC and ECOLOGO labels were identified by 28% of respondents each. Notably, French-speaking and older participants tend to pay less attention to these labels compared to their English-speaking and younger counterparts (see Table 10).

Table 10: Sought Certification Symbols on Clothing

	Canadian eco-certifications	Certification Symbol	Percentage of participants looking for these eco-certifications
01.	The Canadian Food Inspection Agency manages the Canada Organic Biologique Canada Standard for organic agricultural products.		**33%**
02.	The Forest Stewardship Council (FSC) Standard which sets the standard for responsible forest stewardship, addressing the most pressing issues facing Canadian forests		**28%**
03.	The ECOLOGO certification claims to help identify products and services that have been independently certified to meet environmental standards that reflect their entire product life cycle.		**28%**



UNDERSTANDING SUSTAINABILITY CERTIFICATIONS IN FASHION

The wide range of sustainability certifications in the fashion industry can make them difficult to navigate. This complexity stems from both the multi-faceted nature of sustainability and the fashion supply chain, which involves product safety, environmental impact, and human rights. To assess consumer awareness, we asked participants whether they had purchased clothing with some of the most common certifications and if they understood what these labels truly represent.

About a third of participants bought a garment with the Fairtrade logo, and a fifth recognized GOTS, Made in Green, B-Corp.

Among participants, 31% reported buying Fairtrade certified garments, while 21% purchased those certified by the Global Organic Textile Standard (GOTS). B-Corp certified clothing was bought by 18%, followed by Oeko-Tex Made in Green at 17%, and bluesign certified products at 12%. Knowledge of these labels followed a similar pattern: Fairtrade was recognized by 31% of participants, while only 9% were familiar with bluesign (see Table 11).

Although these percentages may appear low, they indicate a growing recognition of sustainable third-party certifications.

This finding suggests an opportunity for brands and retailers to increase offerings of certified garments. However, there is also a pressing need for consumer education about what these labels mean to empower informed shopping decisions.

One reason for the limited purchases of certified clothing may be the relatively low availability of such garments compared to uncertified options. Given that more than half of participants actively seek third-party certifications, there is a clear incentive for brands to produce more garments that meet certification standards.

Table 11: Recognition and purchase of sustainability certifications in fashion

Description of certifications	Certification Symbol	Bought clothes with certification in %	Know the meaning of certification in %
Fairtrade Labeling Organization International (FLO) works with fair trade labels and increasingly with producers to guarantee that workers are well treated and receive minimum wages and premium payments for the community.	FAIRTRADE	31%	31%
The Global Organic Textile Standard (GOTS) has traceable schemes for raw materials, criteria for the finishing processes, and requisites of social responsibility. A textile product carrying the GOTS label must contain a minimum of 70% certified organic fibres.	GLOBAL ORGANIC TEXTILE STANDARD · GOTS ·	21%	24%
Oeko-Tex Made in Green certifies the absence of harmful textile chemicals and offers transparency by making supply chains traceable.	OEKO-TEX® CONFIDENCE IN TEXTILES MADE IN GREEN	17%	18%
B Lab is a not-for-profit organization certifying B corporations for meeting transparency, sustainability, social accountability, and performance standards. The objective is to encourage companies to meet specific standards to promote the interests of their communities, not only their shareholders.	Certified B Corporation	18%	15%
bluesign is a multi-criteria guarantee that manufacturers produce fabrics with a minimal pollution load, that their products are as harmless for the environment as possible, and that they are made with minimal use of resources.	bluesign®	12%	9%

IDENTIFYING GREENWASHING IN FASHION

Next, we explored how difficult it is for participants to identify greenwashing in clothing brands. Among our survey respondents, only 17% reported that determining greenwashing is easy or very easy, while 46% found it difficult or very difficult. The remaining 37% felt it was neither easy nor difficult (see Figure 22).

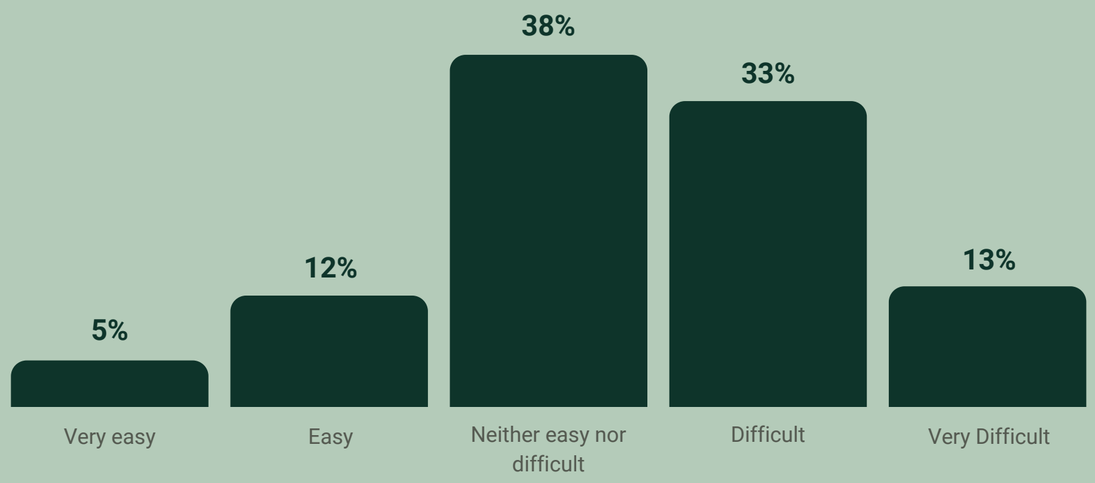


Figure 22: How difficult is it to identify greenwashing in fashion?

As a significant number of participants reported finding it difficult to identify examples of greenwashing in fashion, we wondered if those who claimed it was easy to recognize it, could actually do so. This brings to mind the Dunning-Kruger effect, which suggests that a lack of knowledge in a specific area can lead individuals to overestimate their competence (Kruger & Dunning, 1999). In this context, we questioned whether those who believed they could identify greenwashing truly possessed that ability.

To explore this, we presented participants with ten real-life examples of greenwashing and non-greenwashing labels, signage, and advertising, asking them to identify which were greenwashing with a simple yes or no response. Each participant had a 50% chance of selecting the correct answer. The results revealed a mixed ability to identify greenwashing, with identification rates skewed around a 60%-40% or 40%-60% distribution. This indicates that none of the examples were easily recognizable. Interestingly, participants who claimed that greenwashing was easy to detect tended to provide more incorrect answers, further supporting the presence of the Dunning-Kruger effect in our findings.

The participants who stated that greenwashing was easy to detect had more wrong answers than those who did not.

EXAMPLE 1: CIRCULAR SWIMWEAR

Rinaldi (2019) claims that the main drivers for change in the fashion industry are traceability, transparency, circularity, and collaborative consumption. Since the fashion industry operates in a linear system, circularity has become the new buzzword to reduce the need for virgin resources and textile waste. Over half (59%) of the participants inaccurately believed that swimwear designated with an in-store sign that stated “100% circular swimwear” was in fact sustainable. There is no proof or explanation as to how it earns the term “circular”; rather the term is used to mislead the customer into thinking that the product is sustainable, which is the sin of ‘no proof’. For example, the situation would be different if the company collected used swimwear from its customers and then worked with a factory to recycle them into new fibres. Ideally, the garments would then be made from recycled post-consumer textile waste.



Figure 23: Example 1, Circular Swimwear

EXAMPLE 2: DENIM GOES NATURAL

While, at first glance, the messaging that denim goes natural, might be tempting the customer to believe that the jeans are sustainable, but adding 10% spandex (a petrochemical-based fibre material) not only makes the pants challenging to recycle, but the material is no longer “natural”. Natural fibres are derived from animals and plants, with minimal processing to prepare them for use in textiles. Over 55% of participants correctly identified this greenwashing sin of ‘worshipping false labels’. Italy-based Candiani Denim has developed a stretch denim named Coreva that features organic cotton yarn wrapped around a natural rubber core yarn, resulting in a biodegradable garment (Wilson, 2022). This greenwashing claim’ Denim Goes Natural’ undermines the innovation and competitive advantage of truly sustainable stretch denims such as this.



Figure 24: Example 2, Denim Goes Natural

EXAMPLE 3: SUSTAINABLY SOURCED



Figure 25: Example 3, Sustainably Sourced.

We were surprised to find that 60% of participants believed a product was "sustainably sourced" without any additional information or evidence. For instance, a label featuring a picture of a tree claims, "We are making cotton production more sustainable," but it fails to explain how (or if) the tree relates to cotton, or how this production benefits the environment, especially given that conventional cotton farming often poses significant environmental challenges.

Sustainable sourcing requires that materials and components be produced without causing environmental degradation or pollution, and that all manufacturing processes adhere to fair labour practices. Due to the complex supply chains in the fashion industry, proving such comprehensive claims can be quite challenging.

In this context, Canada's recent Bill S-211, known as the Fighting Against Forced Labour and Child Labour in Supply Chains Act, aims to enhance industry awareness and transparency while encouraging businesses to improve their practices. The Act seeks to prevent and reduce the risk of forced or child labour in Canadian supply chains and prohibits the importation of goods produced using such labour.

Despite the garment having an additional certification with a self-declared claim, critical questions remain: Who picked the cotton for this garment, and where is the proof of ethical sourcing?

EXAMPLE 4: CONSCIOUS COLLECTION GARMENT CONSERVES WATER

Almost half of the participants (47%) thought that a garment from a “conscious collection” that claims to conserve water is sustainable. It might be correct that this product requires less water than a similar product, but clearly, the customer has no information on how much water is saved or how much water is used in its production process. Brands advertising their “environmentally friendly” or “conscious collections” with environmental benefits must provide sufficient information and proof, or they may be conducting false advertising.



Figure 26: Example 4, Conscious Collection Conserves Water

EXAMPLE 5: WOOL COAT



Figure 27: Example 5, Composition Label

The Textile Labelling Act in Canada establishes requirements for labelling textile fibres, yarns, fabrics, and products made in whole or in part from these materials. As a government-regulated standard, it serves as a valuable resource for consumers seeking to verify a garment's composition.

However, the findings revealed that 47% of participants believed that this image of a label on a wool coat was greenwashed, despite its compliance with the Textile Labelling Act. The coat was accurately labelled as containing 100% lambswool fabric, with a 100% polyester lining and insulation material comprising 65% olefin and 35% polyester. This suggests that a significant number of Canadians are not well-versed in fundamental labelling requirements or in distinguishing legitimate product claims from greenwashing.

EXAMPLE 6: CERTIFIED RECYCLED NYLON PANTS

Forty-two percent of participants viewed nylon pants labelled with the Global Recycled Standard (GRS) and Cradle to Cradle certification as greenwashed, while 58% disagreed. The GRS is a voluntary standard for tracking recycled materials in products, requiring at least 50% recycled content and additional environmental and social criteria (Textile Exchange, 2021). Cradle to Cradle certification evaluates sustainability across five categories: Material Health, Product Circularity, Clean Air & Climate Protection, Water & Soil Stewardship, and Social Fairness (Cradle to Cradle, 2024). Both certifications are legitimate eco-labels, not examples of greenwashing.

However, the situation is complex. Most recycled nylon is sourced from fishing nets and carpet fibres rather than post-consumer textile waste, representing open-loop recycling, which does not contribute to a truly circular fashion system. In contrast, closed-loop recycling allows materials to be endlessly recycled back into high-quality raw feedstock, preserving their properties.

If consumers do not understand the distinction between open and closed-loop recycling, they may mistakenly believe their purchases are part of a circular economy, influencing their shopping behaviour based on the assumption that old garments can be recycled at the end of their life. See also In Focus: Is recycled polyester greenwashing?

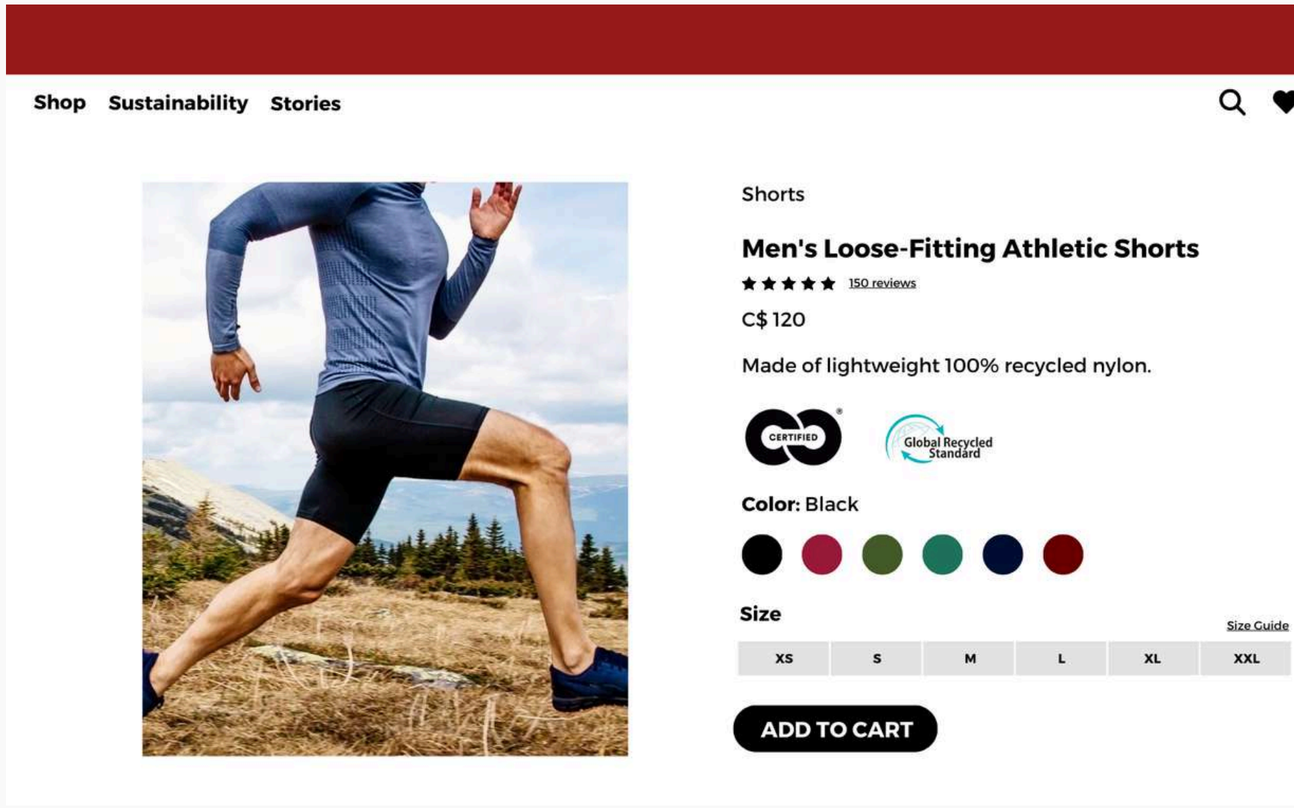


Figure 28: Example 6, Recycled Content

Consumers lack knowledge of how textiles must be labelled and are not familiar with common certifications.

EXAMPLE 7: ORGANIC COTTON

Over half (57%) of participants recognized that a pair of denim jeans with the GOTS (Global Organic Textile Standard) organic cotton logo is a valid certification, and not an example of greenwashing. The Organic Trade Association explains that GOTS functions as a:

> *high-level environmental criteria along the entire organic textiles supply chain and requires compliance with social criteria as well. Only textile products that contain a minimum of 70% organic fibres can become GOTS certified. All chemical inputs such as dyestuffs and auxiliaries used must meet certain environmental and toxicological criteria. The choice of accessories is limited in accordance with ecological aspects as well. A functional waste water treatment plant is mandatory for any wet-processing unit involved and all processors must comply with minimum social criteria," (The Organic Trade Association, p. n.a.).*



Figure 29: Example 7, 100% Organic Cotton

EXAMPLE 8: BIODEGRADABLE POLYESTER

Many participants (61%) did not realize that gloves made from recycled polyester cannot biodegrade, as claimed on the label, and that they are therefore victims of ‘worshipping false labels’. Until ‘bio-based’ synthetics have replaced virgin or recycled materials, it will never biodegrade. See also In Focus: Biodegradable vs Compostable.



Figure 30: Example 8, Biodegradable Polyester Gloves

EXAMPLE 9: SUSTAINABLE + VEGAN

Sixty percent of participants identified the use of "sustainable" alongside "vegan" in footwear marketing as greenwashing, while 40% believed these terms indicated true sustainability. This highlights a common misunderstanding of both concepts. Vegan refers to plant-based products, but vegan leather is often made from polyvinyl chloride (PVC) and polyurethane (P.U.), which are harmful in production and are non-recyclable, contradicting sustainability. While marketed as cruelty-free, vegan leather cannot be deemed sustainable due to its environmental impact.

This example illustrates two issues: the vague claims in the marketing (The Sin of Vagueness) and false environmental claims (The Sin of Fibbing), as these shoes are not genuinely plant-based.

Customers often lack familiarity with key terms used in fashion, such as "natural," "vegan," "biodegradable," and "organic."



Figure 31: Example 9, Sustainable + Vegan

EXAMPLE 10: SHOP AND SAVE THE PLANET

Our last example showed the online shop of an ultra fast fashion brand and claimed that customers can ‘shop and save the planet’, but 56% of our participants recognized that stating this is greenwashing, even if images of nature surround the product. This is a greenwashing practice known as Executional greenwashing. It occurs when companies use nature-evoking elements, such as a forest, mountains or animals, and green, blue or earthy colours (Parguel et al., 2015). While Executional greenwashing is usually not combined with claims, this example is even worse, as the sentence “shop and save the planet” is a Sin of Fibbing. It is false that we can save the planet by shopping.

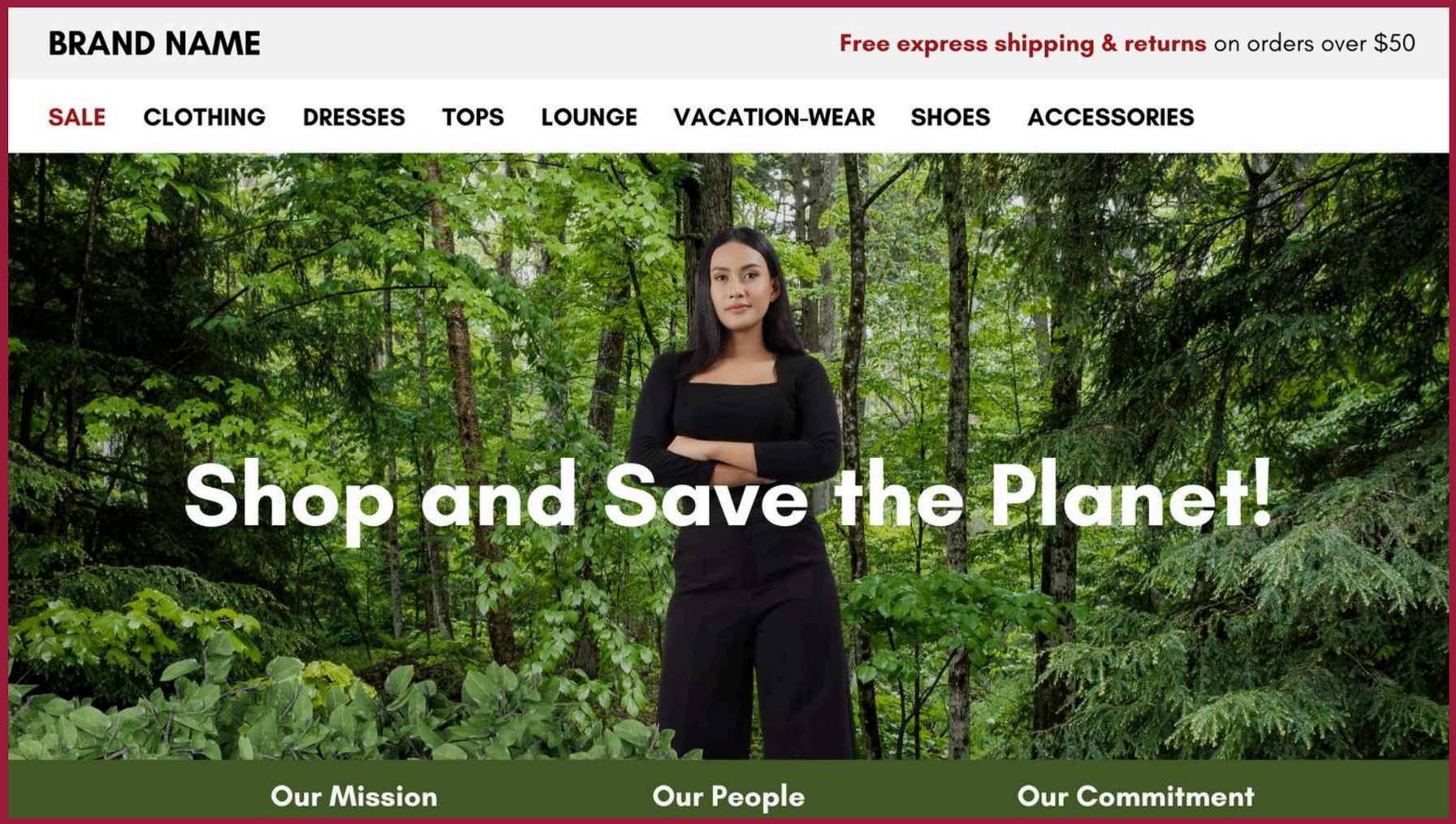


Figure 32: Example 10, Shop and Save the Planet!

Our findings reveal that consumers face significant challenges in evaluating a product's environmental attributes, often struggling to distinguish between credible sustainability claims and misleading greenwashing tactics. This confusion stems from vague terminology, unverified claims, and a lack of standardized labeling, making it difficult for shoppers to make informed choices.

This underscores an urgent need for consumer education to improve awareness and empower individuals to critically assess environmental claims in fashion. Additionally, it highlights the necessity for stronger regulations and industry-wide standards to ensure transparency, hold brands accountable, and protect consumers from deceptive marketing practices.

The difficulty consumers face in identifying greenwashing highlights the urgent need for measures to protect them from mistakenly believing they are buying environmentally beneficial garments.



IN FOCUS:

IS RECYCLED POLYESTER GREENWASHING?

If consumers struggle to identify straightforward examples of greenwashing, it’s likely they also lack awareness of more complex issues, such as the "sin of lesser evils." A CBC Marketplace episode highlighted this concept, particularly in the context of recycled versus virgin polyester. While recycled polyester is often seen as the better option due to its lower energy consumption and reduced environmental impact compared to virgin polyester, both types still contribute to microplastic pollution and require significant energy for production.

Moreover, recycled polyester is primarily made from plastic bottles and packaging, which typically aren’t recycled again, leading consumers to mistakenly believe they are purchasing garments made from old clothes. This misconception can create a false sense of guilt-free shopping, as consumers assume these garments will be recycled at the end of their lifecycle.

From an industry perspective, this is challenging because recycled polyester is endorsed by organizations like the Textile Exchange as a preferred fibre. However, the Textile Exchange advocates for even more sustainable materials, such as bio-based polyester made from sugar cane. Thus, while recycled polyester is a step in the right direction, it is seen as a transitional material until more sustainable alternatives can be developed at scale.

IN FOCUS:

BIODEGRADABLE VS COMPOSTABLE

In Canada, waste management primarily relies on landfilling, meaning that garments thrown in the trash typically end up in landfills. Items made from fossil fuel-derived synthetic fibres, like polyester or nylon, can persist for many years, taking up valuable space. In contrast, garments made from cellulosic fibres, such as rayon or Tencel, as well as natural plant-based or animal fibres like wool, silk, linen, or cotton, have the potential to biodegrade. This process involves breaking down the garment into smaller pieces by bacteria or other living organisms, but it requires specific conditions—such as high temperatures, moisture, and soil.

While human-made cellulosic and natural fibres can decompose faster under optimal conditions, the reality is more complicated. These conditions are often found in industrial composting facilities or home composters, but not in every landfill. Furthermore, many garments are treated with synthetic dyes and chemicals or made from blended fibres (e.g., cotton/polyester), complicating their decomposition. Accessories like buttons or zippers made from non-biodegradable materials, along with polyester threads, also hinder the breakdown process. Consequently, some municipalities advise disposing of garments in the garbage rather than compost bins.

In summary, while the term "biodegradable" is often presented as a solution to textile waste, it falls short. What we need are truly compostable garments that can be returned to the soil as nutrients. For a garment to be compostable, it must consist entirely of organic matter and contain no hazardous chemicals. The challenge lies in helping consumers identify these attributes. Certifications from organizations like the Compostable Manufacturers Alliance or the Biodegradable Products Institute can provide assurance. For example, the Swiss company Freitag produces clothing specifically designed for composting, demonstrating that compostable products are indeed achievable.

CONSUMER REACTIONS TO GREENWASHING

After informing respondents that major international studies indicate 40-60% of all green claims may be greenwashing, we asked how they would react if their favourite clothing brand was found to be culpable. The results, shown in Table 12, reveal that only 23% of participants said it wouldn't matter to them. In contrast, 64% indicated they would either buy less from the brand or stop purchasing altogether. This highlights a significant risk for companies that engage in greenwashing: they could lose business if consumers recognize the practice.

Furthermore, 25% of respondents stated they would inform friends and family to buy less or avoid the brand, . while 17% would share their concerns on social media. Fewer participants would take formal actions: about 15% would report the brand to the Better Business Bureau or the Competition Bureau, around 12% would reach out to an environmental NGO or consumer advocacy group, and approximately 11% would contact the brand directly for an explanation. Only 7% would consider contacting the media, and 6% would reach out to their local politicians.

Overall, while most participants might not take direct action against a brand accused of greenwashing, there remains a significant risk that some will, potentially impacting the brand's reputation and sales.

Table 12: Consumer responses to greenwashing

What would you do if you learned that your favourite fashion brand was greenwashing?	Percentage
Buy fewer of their products	36%
Stop buying their products altogether	28%
Tell people I know to buy fewer, or even none, of the ' 'brand's products	25%
It wouldn't matter	23%
Mention it on social media	17%
Report the brand to the Better Business Bureau or another business overseer	14%
Complain about misrepresentation to Advertising Standards Canada or the Canadian Competition Bureau	12%
Contact an environmental organization or watchdog	12%
Contact the brand and demand an explanation	11%
Contact a consumer advocacy group	10%
Contact the media	7%
Contact my M.P. or MPP to request tighter regulation of the apparel industry in Canada	6%

Reputation risks caused by greenwashing should not be underestimated.

IN FOCUS:

REPUTATIONAL RISK

A central conclusion about greenwashing is the pressing need for brand accountability. Ideally, governments would intervene to penalize companies engaging in misleading environmental claims. As George Harding Rolls from Action Speaks Louder pointed out, “Many green claims have disappeared in the EU and UK due to the significant risks of regulatory penalties.” However, the repercussions of greenwashing extend beyond fines; they include damaging negative publicity.

When a company is exposed for deceiving customers its reputation may be severely harmed. Ashlee Froese, a Toronto based fashion and branding lawyer, noted, “If you’re not compliant with these regulations, you may face penalties from the enforcement of the regulations, in addition, non-compliant brands may also the face the court of public opinion,” With increasing legislation in the fashion industry, greater transparency and whistleblowing are likely making it riskier for companies to engage in greenwashing. Ultimately, their reputation—and customer trust—hangs in the balance.

If you’re not compliant with these regulations, you may face penalties from the enforcement of the regulations, in addition, non-compliant brands may also the face the court of public opinion

WHO DO CONSUMERS TRUST?

We asked participants to demonstrate their level of trustworthiness of sources calling out greenwashing (see Table 13). Environmental NGOs are by far considered the most trustworthy when identifying greenwashing. The least trusted are influencers, bloggers, and celebrities. However, it is generally older people who trust environmental NGOs, while younger demographics are more likely to trust influencers, bloggers, celebrities, news and fashion media, and someone they know working for the company of interest.

Table 13: Perceived trustworthiness of different stakeholders

Trustworthy	Percentage
ENGO	52%
Manufacturer	26%
Someone who works for the company	24%
Government	22%
Industry Association	18%
Retailer	16%
News and Fashion Media	12%
Influencer	9%
Blogger	7%
Celebrity	6%

Environmental NGOs are by far considered the most trustworthy stakeholders to call out greenwashing.

HOW CAN FASHION BRANDS EARN & MAINTAIN TRUST?

How can clothing brands earn and maintain consumer trust to show that they act sustainably and are not greenwashing? Here, 74% of the respondents either agreed or strongly agreed that clothing brands should be active in earning and maintaining their trust to show that they act sustainably (see Figure 33). The methods most agreed with were: transparency about the materials they use, being truthful when making environmental and sustainability claims, communicating their environmental initiatives in simple and easy language, and being transparent in showing what they do with their unsold merchandise.

Overall, while most participants might not take direct action against a brand accused of greenwashing, there remains a significant risk that some will, potentially impacting the brand's reputation and sales.

Participants agree that clothing brands need to earn and maintain their trust to show that they act sustainably.

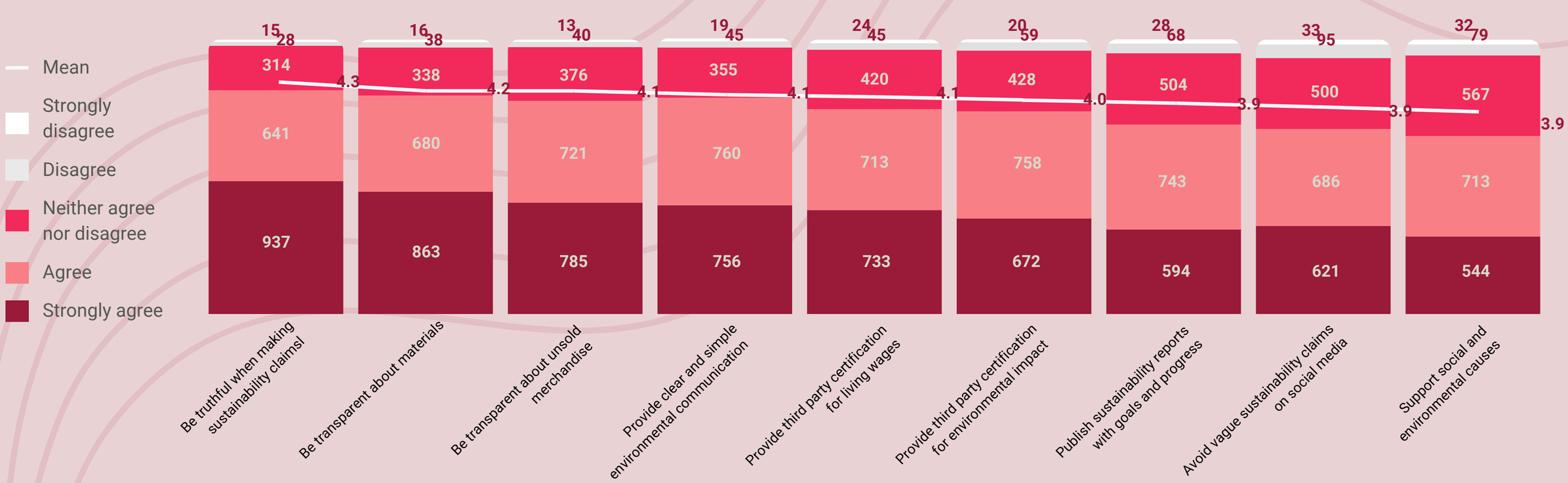


Figure 33: How clothing brands should demonstrate that they act sustainably to earn and maintain consumer trust

The left y-axis represents the frequency of responses for a certain category (very frequently, frequently, occasionally, sometimes, never).
The right y-axis represents the average on a scale between 1 = Strongly disagree to 5 = strongly agree.

IN FOCUS:

FROM GREENWASHING TO GENUINE: HOW BRANDS BUILD TRUST

In their report on creating value from sustainable products, Deloitte laid out “Five actions to build trust and address consumer sustainability skepticism.” (Weintraub et al, 2024) We’ve highlighted three of these below.

“CLARIFYING PURPOSE”
As our interview with expert Ashlee Froese, fashion and branding lawyer, revealed, being clear and specific about your brand’s purpose is vital in communicating honestly with consumers. Froese (personal communication, April 5, 2024) advised, “if you decide that you want to align with an environmental initiative or set a target, then you need to be specific or clear on what that is. Canadian marketing laws hone in on deceptive marketing practices and so you have to ensure that what you are saying your brand will do or accomplish is actually attainable and communicated clearly to the consumer”

“ENGAGING CONSUMERS ON SUSTAINABILITY EFFORTS AT BOTH THE PRODUCT AND THE BRAND LEVEL”
Froese (personal communication, April 5, 2024) gave the example of Patagonia and explained how they have successfully integrated sustainability into their brand identity, not just a single product or product line. They have formed that identity through the “consciousness of their consumers” who, by choosing to buy Patagonia products, are making a “lifestyle choice”. Their “Buy Less” campaign (Lowitt, 2011), encouraging consumers to “buy less, demand more” was considered revolutionary ten years ago, but this counter cultural message did not compromise their sales success, instead it appears to have only grown their consumer base.

“CREATING A MARKETING STRATEGY TO PROMOTE SUSTAINABLE PRODUCTS, EXPLAIN THE FACTS BACKING THE CLAIMS, AND COMMUNICATES THE COMPANY’S SUSTAINABILITY COMMITMENTS”
Brands get in trouble when they make sweeping statements about their products and promise outcomes which are not attainable. George Harding Rolls, Campaign Lead at Action Speaks Louder (personal communication, April 23, 2024) stated, “some brands are in that delusional space where they are setting targets, but not making any progress against them, which is essentially greenwashing”. Brands must engage with specific, actionable targets across their supply chain, and communicate their purpose and action on those targets to consumers.

IN FOCUS:

FROM GREENWASHING TO GENUINE: HOW BRANDS BUILD TRUST

Earning the trust of consumers takes clarity in purpose, engagement with sustainability on multiple levels, and a clear and specific fact based marketing strategy. Elisabeth de Gramont, Chief Brand Officer at Frank & Oak, (personal communication, April 2, 2024) articulated, “We have seen brands start to shy away from using words like sustainability which can become hollow greenwashing tools without specific, measurable impact to support them.” She went on to assert, “We [brands] just have to constantly check ourselves,” to avoid falling into the all too easy trap of greenwashing,” (E. de Gramont, personal communication, April 2, 2024)

As legislation around greenwashing continues to develop, it becomes increasingly costly for brands to make greenwashing missteps. Even brands that are not consciously utilizing greenwashing may find themselves caught in generalization or oversimplification. As Linda Wegelin, CCO at TESTEX AG, (personal communication, April 10, 2024) expressed, it can be “...very difficult to find the balance between not greenwashing and at the same time not overwhelming the customer.” The reality of more ethical and sustainable operations can be complex and difficult to communicate quickly to the consumer as they shop. What most of the experts interviewed agreed upon was that specificity, measurability and above all, honesty, are key in avoiding greenwashing.

EXPERTS SPEAK: HOW TO SOLVE GREENWASHING

We asked our panel of experts for their opinion on how greenwashing in the fashion industry be reduced or avoided. In summary, they felt that it is essential to adopt several key practices. Companies should either omit any claims about environmental friendliness or ensure their marketing strategies are aligned with specific, measurable proof to avoid deceptive practices. A proposed amendment to Canadian law emphasizes the need for such proof to be detailed and quantifiable, which could significantly impact industry standards. Investment in sustainable practices should precede any expected returns, highlighting the importance of investing first to achieve genuine outcomes. Smaller, local brands often set a strong example by communicating with authenticity. Additionally, clear reporting standards and published guidelines are necessary to ensure compliance and transparency. Transitioning to sustainable and circular business models is crucial for creating a more accountable and eco-friendly industry. See individual responses below.



ASHLEE FROESE:
The practice of greenwashing is marketing yourself to be environmentally, ecologically friendly. So how you avoid a claim of greenwashing is to either omit any claims…or if you do have a marketing strategy, and you're promoting it as such to entice consumers to purchase your products over another, then make sure that you are satisfying the requirements to avoid deceptive marketing practices" (A. Froese, personal communication, April 5, 2024).

RACHEL KITCHIN:
One of the proposed amendments to Canada's law is really interesting because it would require the onus to be on proof and the proof needs to be specific, and it needs to be measurable. If we can demand that, it would have a huge effect across the entire industry, regarding what people feel comfortable saying" (R. Kitchin, personal communication, April 8, 2024).

SAGE PAUL:
Supporting local initiatives is crucial. By collaborating with local mills and sourcing materials directly from farms, we have more visibility over our supply chain, while at the same time fostering a vibrant local economy. It's about building a sustainable system right from the fibre through to the finished product and sharing that story with the customer (S. Paul, personal communication, September 9, 2024).

LINDA WEGELIN:
"If different stakeholders engage in open dialogue with humility, they don't always need to be the ones leading or gaining the most. True progress requires collective action, yet too often, the focus remains on maximizing individual profit. In reality, everyone benefits in the long run—but only if we're willing to contribute first. It's a return on investment: you have to invest before you see the rewards." (L. Wegelin, personal communication, April 10, 2024).

GEORGE HARDING ROLLS:
[Can reduce] By looking at the smaller brands and the way they communicate, because they do it with a level of authenticity (G. Harding Rolls, personal communication, April 23, 2024).

DR. WREN MONTGOMERY:
We need clear reporting standards and mandatory criteria that are consistent, ensuring that companies cannot make green claims unless they meet specific requirements (W. Montgomery, personal communication, March 18, 2024).

ELISABETH DE GRAMONT:
In an ideal world, there would be an organization that publishes guidelines for brands to follow or subscribe to, providing clear guardrails for their practices (E. de Gramont, personal communication, April 2, 2024).

MYRIAM LAROCHE:
Our current business model no longer makes sense and no longer works. Since greenwashing is anchored in capitalism, we have to develop a new business model that is sustainable and circular (M. Laroche, personal communication, March 28, 2024).

GOVERNMENT'S ROLE: AWARENESS OF GREENWASHING REGULATIONS

While the majority of participants recognized that greenwashing is a serious issue, we wanted to know if they are familiar with the Canadian 'Competition Act' [s. 74.01(1)(a)] that prohibits representations to the public that promote a product or any business interest that is false or misleading. We found that more than half of our participants (65%) were unaware of this Act, administered by the Competition Bureau.

Next, we asked the participants about the government's role in protecting Canadians from greenwashing by clothing companies (see Figure 34). Overall, the respondents agreed with every one of the roles or actions we presented, with 76% strongly or somewhat agreeing that the government should fine agencies and other communications companies for misrepresenting sustainability practices. This was followed by a call to provide guidelines about advertising and other communication about greenwashing in the industry (75%). While participants are not aware that the Competition Act also provides guidance to brands, they are looking for protection and fines.

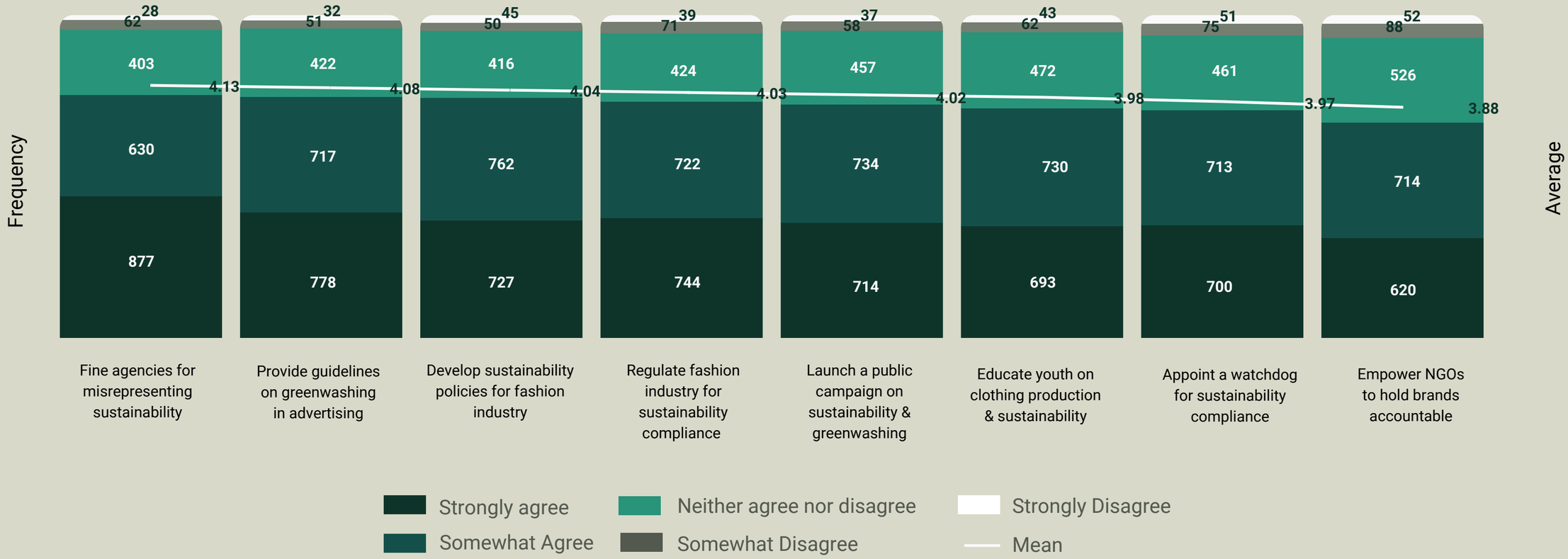


Figure 34: Government's role in protecting Canadians from greenwashing in fashion

The left y-axis represents the frequency of responses for a certain category (very frequently, frequently, occasionally, sometimes, never).
The right y-axis represents the average on a scale between 1 = Strongly disagree to 5 = strongly agree.



Canadians agree that the government should address greenwashing in the fashion industry.

Our survey results highlight the need to better inform the public about Canadian greenwashing legislation and the role of the Competition Bureau. To address this, we have added a dedicated section after the conclusion of the research findings, examining consumer protections in Canada and comparing them to international standards. This section is comprehensive—almost a report in itself—and includes policy recommendations aimed at fostering discussion and supporting the development of more effective regulations on greenwashing.

KEY INSIGHTS & IMPLICATIONS

In the face of significant challenges, including the aftermath of a global pandemic, economic uncertainties, and environmental crises, the fashion industry is under increasing pressure to reduce its environmental impact. However, sustainable fashion alternatives remain largely invisible to consumers in stores and on product labels. While many consumers express concern for the environment and aspire to live more sustainably, they often lack clear guidance on how to do so. Common practices like washing clothes in cold water and donating unwanted garments are helpful, but there is a clear need for more comprehensive advice on sustainable shopping. This gap has led businesses to navigate the intersection of sustainability and marketing, giving rise to the issue of greenwashing.

As consumers actively seek products that positively impact the environment, businesses strive to project an image of sustainability, even if their practices fall short. Participants in this survey were primarily influenced by the products they encounter in stores rather than fashion media, influencers, or celebrities. This highlights that comfort is the most important criterion for clothing selection, followed closely by price and fit, while concerns about environmental issues and fair labour practices, though secondary, remain significant. Once consumers are satisfied with a garment's primary function, they want assurance that it is produced responsibly



This image was AI-generated and may contain approximations or artistic interpretations.

and with minimal environmental impact. They expect brands to prioritize ethical practices alongside profitability. The survey revealed that 41% of participants have purchased sustainable fashion, indicating that it is no longer a niche market. However, the low recognition of sustainable or eco-friendly garments raises concerns about their availability and visibility. It is crucial for brands to clearly label sustainable products, and for consumers to actively seek out these features when shopping.

Greenwashing emerged as a major concern for participants. While nearly 75% were initially unfamiliar with the term, 49% recognized it as a serious issue once informed. This highlights the importance of consumer awareness and the need for transparency in marketing practices. A staggering 79% of participants expressed frustration over greenwashing. The gap between low awareness and high concern underscores the urgency of educating consumers about the prevalence and implications of greenwashing. Additionally, only 49% of participants were aware of the negative impact of the fashion industry, reinforcing the need for enhanced consumer education.

Participants noted various greenwashing tactics, such as the use of buzzwords without evidence, vague claims, and an emphasis on minor positive actions while overlooking broader environmental impacts. Social media and advertising campaigns were identified as primary sources of greenwashing, with global clothing chains and fast fashion retailers being viewed skeptically. In contrast, Canadian-owned boutiques, sustainable merchandise stores, and small boutiques were perceived as less likely to engage in greenwashing. While many participants have never purchased items promoted with greenwashing claims, some admitted to doing so occasionally.

Identifying greenwashing proved challenging for consumers, with 46% finding it difficult to discern. The complexity of the issue became evident when participants were presented with real-life examples of greenwashing claims, leading to a mix of accurate and inaccurate identifications. To verify sustainability claims, consumers often check garment labels for fibre content and country of origin, look for third-party certifications, and seek information from trusted sources like environmental NGOs. However, 63% of participants had not seen any third-party certification symbols on clothing, indicating a need for better visibility and consumer education regarding these certifications.

As consumers struggle to identify greenwashing claims, they need both education and protection. The new Bill C-59, an amendment to the Competition Act, aims to require companies to substantiate their environmental claims, helping to curb misleading marketing practices associated with greenwashing. If enforced, this regulation could help differentiate genuinely sustainable companies from those merely posing as such, enabling consumers to make more informed choices.

The government’s role in combating greenwashing is crucial. Although 65% of participants were unaware of the Canadian Competition Act's provisions against false or misleading representations, there is strong support for government action. Many believe the government should impose fines on companies

that misrepresent their sustainability practices and provide guidelines for advertising related to greenwashing. This aligns well with the objectives of Bill C-59, assuming the regulations are enforced.

In conclusion, while consumer concern for the environment is high, significant gaps exist in awareness, education, and the visibility of sustainable options. Brands must prioritize transparency and clearly label sustainable products to build trust and help consumers make informed choices. Government regulations and consumer education are essential in combating greenwashing and promoting genuine sustainability practices. To bridge these gaps, Fashion Takes Action has developed educational workshops designed to empower both consumers and brands to make more sustainable choices while addressing greenwashing. By tackling these issues, we can foster a market that values environmental and social responsibility, ultimately benefiting consumers, businesses, and the planet.



GREENWASHING POLICY & CONSUMER PROTECTIONS: INSIGHTS FROM THE STUDY

Our findings show that Canadians are eager for legislation to protect them from greenwashing, yet many are unaware that such protections already exist and are enforced by the Competition Bureau. To address this gap, we have included a research section in our study that explores current greenwashing legislation and offers additional recommendations based on our findings.

Our research indicates that 58% of participants consider the environmental impact of garments important or very important; however, only 47% actively verify the accuracy of sustainability claims made by clothing companies. Furthermore, participants demonstrate limited awareness of the fashion industry's negative impact and struggle to identify greenwashing practices. This gap highlights the potential for misleading environmental claims to confuse consumers, leading to decisions that could differ significantly with access to accurate information. Consequently, government intervention is essential to safeguard consumers from deceptive claims in the fashion industry. Without reliable information, consumers are at risk of making poor choices, which not only harms them but also disadvantages honest competitors.

In the next section, we will examine how misleading environmental claims are addressed under current Canadian legislation, including the Competition Act and Bill C-59, to better understand the protections available to consumers in Canada. We will also compare greenwashing legislation in the European Union and other countries to identify differences with Canadian laws, contributing to ongoing discussions about potential improvements or updates to these regulations. Additionally, understanding the greenwashing frameworks in other countries will help Canadian companies navigate the complexities of cross-border business.

As environmental concerns grow and the urgency for carbon reduction increases, advocating for robust and effective regulatory frameworks is crucial. Such measures will help consumers and businesses navigate the complexities of environmental claims, fostering a more transparent and sustainable marketplace.



CANADIAN GREENWASHING LEGISLATION

Businesses in Canada must comply with laws enforced by the Canadian court system that protect and regulate consumers and companies. The Department of Justice oversees crucial legislation, including the Income Tax Act, Bankruptcy and Insolvency Act, Consumer Protection Act, Contract Law, Employment Standards, Sale of Goods Act, Intellectual Property Law, Personal Information Protection and Electronic Documents Act (PIPEDA), Competition Act, and Canadian Business Corporations Act.

The Department ensures that Canada's justice system is fair, accessible, and efficient, working with the federal government to develop policy and reform laws. Within the Department, the Legal Service of the Competition Bureau, led by the Commissioner of Competition, is known as the "watchdog" of competition, administering and enforcing key Acts to protect market fairness. The Competition Bureau is responsible for administering and enforcing the following four Acts: The Competition Act, The Consumer Packaging and Labelling Act (CPLA), The Textile Labelling Act and The Precious Metals Marketing Act. However, because greenwashing legislation is not enforced through the Precious Metals Marking Act we have excluded it from our research.

THE COMPETITION ACT

The Competition Act is designed to promote competition in Canada, enhancing economic efficiency and adaptability while enabling Canadian businesses to participate effectively in global markets. It acknowledges the significance of foreign competition, ensures fair opportunities for small and medium-sized enterprises, and strives to provide consumers with competitive prices and a diverse range of product choices. Under this Act, no company can leverage its market power to harm competitors or diminish competition. Consequently, if a company employs greenwashing claims to boost sales and gain an unfair advantage over its rivals, it is in violation of the Competition Act.

Currently, the Competition Act is undergoing revision. A guide outlining amendments to Bill C-59, which relates to the new Competition Act, was released in June 2024, and at the time of this report, the amendment is in the public consultation phase. These recent amendments introduce stricter provisions concerning Deceptive Marketing Practices, making it illegal to advertise or market products in a false or misleading manner, whether through print, digital, verbal, or visual means. These updates specifically address growing concerns about deceptive advertising, particularly related to environmental claims (greenwashing). Key updates include:

(1) Explicit Greenwashing Regulations: One of the most significant changes involves stricter scrutiny of environmental claims. The updated provisions now specifically target greenwashing, making it an offence to make false or misleading environmental claims, such as vague terms like "eco-friendly" or "sustainable," without substantiation. Companies must back these claims

with credible evidence or face penalties (Trottier, 2024).

(2) Private Right of Action: Starting in 2025, private parties—such as consumers and competitors—will have the ability to bring claims regarding deceptive marketing practices directly to the Competition Tribunal. This new provision streamlines the process for individuals and environmental advocacy groups to challenge misleading claims without needing to wait for the Commissioner of Competition to intervene (McNaughton et al., 2024). As a result, this private right of action significantly empowers consumers.

(3) Increased Penalties: The amendments impose higher administrative monetary penalties for violations. For corporations, penalties can reach up to $10 million for the first offence and $15 million for subsequent offences, or 3% of the company's worldwide revenues, whichever is higher. These penalties represent a significant increase from previous limits and incentivize compliance (McNaughton et al., 2024).

(4) The General Impression Test: The "general impression" test is reinforced, meaning that even if specific claims on a product are technically accurate, the overall impression created by the marketing or labelling (including imagery and design) must not be misleading. The general impression test broadens the scope of what constitutes deceptive practices (McNaughton et al., 2024; Thiboutot et al., 2024).

These updates reflect a broader initiative to protect consumers from deceptive marketing, with a particular emphasis on preventing misleading claims related to sustainability and environmental responsibility. While a revised guide for industry and advertisers on avoiding greenwashing claims is currently in development, the previous version of the Competition Act provided best practices to help companies navigate these issues.

These best practices included ensuring that all claims are truthful and not misleading, clearly outlining the environmental benefits of products, and requiring that claims are substantiated and verifiable. This means that any assertions made must be backed by adequate and proper testing to prevent misinterpretation of results. Additionally, companies should avoid exaggerating their product's environmental benefits and must not imply third-party endorsement unless it is genuine. When in doubt about the potential for a claim to mislead or misrepresent, the recommendation is to refrain from making the claim altogether (Government of Canada, 2021a).

THE CONSUMER PACKAGING AND LABELLING ACT (CPLA)

The Consumer Packaging and Labelling Act (CPLA) regulates the packaging, labelling, sale, importation, and advertising of pre-packaged products, along with specific other items such as textiles, household products, health and beauty goods. This Act ensures that the information provided to consumers is accurate and not misleading, empowering them to make informed purchasing decisions. While most garments are typically sold without packaging, some do feature additional hang tags and labels designed to attract consumer attention and offer

further product information.

Deceptive Marketing Practices fall under the Competition Act and apply broadly to any marketing or advertising claims made by businesses. Although these practices are not explicitly addressed in the Consumer Packaging and Labelling Act (CPLA), the two Acts intersect when it comes to regulating false or misleading claims on product labels. This intersection means that the provisions regarding deceptive marketing also apply to labelling practices that involve misleading information, creating a complementary regulatory framework that enhances consumer protection.

THE TEXTILE LABELLING ACT

A "label" is any mark, sign, stamp, brand, or ticket that conveys information about a textile product. Labels must be accurate, legible, and available to consumers at the time of purchase. Permanent labels must remain attached and readable for at least ten washings, while non-permanent labels can include hang tags, wrappers, or stickers. Most garments require permanent labels, but some items, like undergarments and swimwear, are exempt (Government of Canada, 2022b). Additionally, textiles made for an organization's internal use and second-hand or disposable items do not need labels. Any information provided on labels must be truthful and not misleading (Government of Canada, 2022b).

The Textile Labelling Act aims to protect consumers from misrepresentation in textile labelling and advertising, enabling informed choices based on fibre content (Government of Canada, 2022a). It mandates that each textile product disclose: (1) the generic fibre content and the percentage of each fibre; (2) the dealer's name, address, and Canadian Identification Number; (3) the country of origin; (4) easy accessibility of the label; and (5) bilingual information in English and French (Government of Canada, 2021b).

While care instructions on labels are not mandatory, if provided, they must be accurate. Although care labels are voluntary in Canada, they are required in other countries. The Canadian standard for care labelling is aligned with the North American Free Trade Agreement (NAFTA) (Government of Canada, 2021b).

Our survey found that 73% of participants check the generic fibre content on textile labels, reflecting consumer awareness. However, using this information to validate sustainability claims can lead to misunderstandings. For instance, many consumers struggle to recognize less common fibres like "Olefin," a synthetic derived from polyolefin materials, which is often blended with wool. When presented with a wool coat containing Olefin fibres, only 47% of participants identified the label correctly as an example of greenwashing.

New regulations targeting greenwashing also affect the Textile Labelling Act due to the enhanced scrutiny of environmental claims under the Competition Act. Textile companies must substantiate any green claims to avoid penalties for misleading consumers. Thus, labels with environmental claims—such as "eco-friendly," "organic," or "made from sustainable

materials"—are subject to stricter verification. Claims regarding the environmental benefits of textiles must be backed by concrete evidence, and misleading labels could face legal challenges under both the Competition Act and the Textile Labelling Act (Trottier, 2024).

GLOBAL GREENWASHING LEGISLATION

The fashion industry operates on a global scale, creating a complex regulatory environment for cross-border businesses due to differing laws and regulations. Many countries have enacted anti-greenwashing legislation, with some enforcing strict measures against misleading environmental claims. Before we delve into the various greenwashing regulations, we will summarize the tactics companies employ to mislead consumers and harm the environment while stifling competition, as outlined by the United Nations. This will provide valuable insight into the types of laws and regulations that may be necessary for developing effective anti-greenwashing measures.

- Claiming net-zero emissions with no credible plan.
- Using vague or non-specific language about operations or materials.
- Applying misleading labels like “green” or “eco-friendly” without clear definitions.
- Overstating the impact of minor improvements or minimal regulatory compliance.
- Highlighting a single positive attribute while ignoring other environmental impacts.
- Claiming to avoid irrelevant illegal practices.
- Promoting sustainability attributes of a product separately from broader brand practices, such as a product made from recycled materials but produced in an environmentally harmful factory (United Nations, 2024).

We will examine the European legislation on greenwashing and compare it with Canada’s Bill C-59, as the EU is known for having some of the strictest regulations in this area. Following that, we will provide a brief overview of related legislation from the United Kingdom, the United States, Australia, France, and the Netherlands. Notably, countries that are major garment producers, such as China and Bangladesh, do not have specific laws targeting greenwashing; therefore, they are not included in this discussion, even though they may have broader regulations that indirectly address misleading environmental claims.

THE EU'S GREENWASHING DIRECTIVE AND GREEN CLAIMS DIRECTIVE

At present, EU law does not explicitly address environmental claims. Instead, such claims fall under the broader regulations of Directive 2005/29 on **Unfair Business-to-Consumer Practices and Directive 2006/114 on Comparative Advertising** (Oyarzabal et al., 2023). However, a 2020 study commissioned by the European Commission found that 53% of environmental claims examined in the EU were either vague, misleading, or unfounded, and 40% were entirely unsubstantiated (H2Compliance, 2024). This result led the European Parliament and Council to

adopt Directive (EU) 2023/2078, officially known as the **EU's Greenwashing Directive**, in November 2023. The Greenwashing Directive addresses the broader issue of greenwashing by amending existing consumer protection laws to tackle misleading or deceptive practices related to environmental claims.

The Greenwashing Directive is intended to work in tandem with the **Green Claims Directive (2023/0085/COD)** which aims to standardize and strengthen the rules for environmental claims made by businesses to ensure they are accurate and substantiated. Its primary goal is to provide clear and reliable information to consumers about the environmental impact of products and services.

MISLEADING & COMPARATIVE ADVERTISING (DIRECTIVE 2006/114/EC.)

Based on the European Union (2006),The Directive 2006/114/EC aims to protect businesses from misleading and unfair advertising practices. The Directive establishes the rules under which comparative advertising is permitted. Key issues are:

Misleading Advertising:

- Advertisements that could mislead recipients are prohibited, especially if they influence the economic behaviour of consumers or traders, or harm competitors.
- The misleading nature of an ad is determined based on factors such as the characteristics of the product or service, price, supply conditions, and the advertiser's identity or qualifications.

Comparative Advertising:

- Refers to advertising that mentions a competitor or competing products.
- Allowed only if it is not misleading and serves to inform consumers objectively.
- Comparisons must involve similar products or services, be based on objective, relevant, and verifiable criteria, avoid confusion between traders, and not discredit or exploit competitors' trademarks or trade names.

The new EU's Greenwashing Directive and the Green Claims Directive will reinforce the principles of the Misleading &Comparative Advertising Directive by providing more explicit requirements for substantiating and communicating environmental claims, making the Directive a key legislation combating greenwashing. It aims to create a fairer market, discourage deceptive practices, and promote genuine sustainability efforts by making greenwashing more difficult and riskier for companies Based on Ernst & Young Global (2024), key features include:

- **Disclosure Requirements:** Companies must disclose details such as the environmental aspects, standards used, scientific evidence, lifecycle considerations, and any related greenhouse gas offsetting. Information should be accessible via a URL or QR code.
- **Third-Party Verification:** Claims and labels will need third-party verification to ensure compliance. EU Member States will be responsible for setting up verification processes.

- **Sanctions for Noncompliance**: Companies can face fines up to 4% of annual turnover, confiscation of revenues, or temporary exclusion from public procurement for false claims.
- **Amendments:** The European Parliament allows 30 days for corrective action if a company is found noncompliant, provides flexibility for simpler claims, and grants an extra year for small to medium enterprises (SMEs) to comply. Micro-enterprises are exempt.

THE EMPOWERING CONSUMERS DIRECTIVE (EU 2024/825)

The EU’s Greenwashing Directive creates a harmonized set of rules and amendments to existing Directives; for example, in March 2024, an amendment of the EU 2024/825 Directive, also known as the Empowering Consumers Directive (Eikel et al., 2024) was released. The EU's Empowering Consumers Directive aims to enhance consumer protection and support the green transition by addressing gaps in existing regulations. Eikel et al. (2024) provide an overview of the changes to environmental and social advertising outlined in the Empowering Consumers Directive, which we briefly summarize below:

(1) Scope of the Directive: The Empowering Consumers Directive amends the Unfair Commercial Practices Directive and primarily applies to business-to-consumer (B2C) contexts. It may also impact business-to-business (B2B) transactions, especially if B2B claims are passed on to consumers. The Directive excludes mandatory messages required by EU or national law, potentially benefiting corporate reports that are legally required but may include additional voluntary information.

(2) Prohibition on Generic Environmental Claims: The Directive sets strict standards for "generic environmental claims" such as “eco-friendly” or “green”. These claims are only permissible if supported by proven excellent environmental performance. Generic claims must meet high standards of environmental performance, adhering to recognized ecolabelling schemes or top environmental performance under EU law. Claims like “sustainable” must reflect both environmental and social attributes, not just environmental performance alone.

(3) Sustainability Labels: Sustainability labels must be accredited by public authorities or based on independent certification schemes. Labels used by private companies must be open to all competitors and managed by independent third parties. This change aims to ensure transparency and credibility in using sustainability labels.

(4) Future Environmental Performance: Claims about future environmental performance, such as achieving carbon neutrality by 2030, must be based on clear, public, and verifiable commitments. Companies must provide detailed implementation plans with measurable targets and budgetary resources, and independent experts must regularly monitor these plans.o-enterprises are exempt.

(5) Claims Based on Greenhouse Gas Emission Offsets: The Directive prohibits claims of environmental

benefits based on greenhouse gas emissions offsetting, such as “climate neutral” or “carbon positive.”

(6) Advertising Mandatory Requirements as Distinctive Features: Companies cannot advertise compliance with legal requirements as a unique feature of their products. For example, mandatory recycled content cannot be marketed as a distinguishing feature, though steps beyond legal requirements can be advertised.

(7) Claims Should Only Relate to Relevant Aspects: Environmental claims must be specific and accurately reflect the product or business aspect they address. Claims cannot apply to the entire product or business if they only pertain to a particular component or activity.

(8) Commercial Communication on Circularity: The Directive addresses claims related to the circularity of products, including durability, repairability, and recyclability. It prohibits misleading claims about product features, such as false repairability claims or omissions about product durability and software updates.

Overall, the Empowering Consumers Directive seeks to strengthen consumer protection by establishing higher standards for environmental claims and sustainability communication, paving the way for stricter regulation of green advertising practices. The amendment to this directive aims to build trust in product information and promote more sustainable consumption by enhancing transparency and combating unfair business practices.

THE CONSUMER RIGHTS DIRECTIVE (2011/83/EU.)

The EU’s **Empowering Consumers Directive** (2024/825) builds on the **Consumer Rights Directive (CRD)** (2011/83/EU) to tackle modern challenges like greenwashing. Both are complementary pieces of EU legislation aimed at protecting consumers, but they address different aspects of consumer protection.

The Consumer Rights Directive (CRD) (2011/83/EU) is designed to harmonize consumer protection rules across the EU, particularly for distance contracts (such as online purchases) and off-premises contracts (e.g., door-to-door sales). It establishes key requirements related to pre-contractual information, the right of withdrawal, delivery obligations, and digital content rights. The Directive's main objective is to ensure consumers are well-informed and have the ability to cancel specific types of contracts within a set period (European Union, 2022).

Although the CRD does not explicitly address greenwashing, it provides a foundation for consumer protection by mandating transparency and truthful information. The new regulations complement the CRD by imposing stricter requirements for businesses to substantiate environmental claims, ensuring that misleading green claims are treated as unfair commercial practices. This alignment enhances the CRD's role in safeguarding consumers, specifically addressing deceptive environmental claims and promoting fair practices in the marketplace.

UNFAIR COMMERCIAL PRACTICES DIRECTIVE (DIRECTIVE 2005/29/EC.)

The EU's **Empowering Consumers Directive** (2024/825) builds upon the **Unfair Commercial Practices Directive (UCPD)** (2005/29/EC). The UCPD outlines that unfair business-to-consumer practices within the European Union are prohibited. It covers any actions or omissions related to traders' promotion, sale, or supply of products to consumers. The UCPD aims to enhance consumer confidence and facilitate a more integrated EU Internal Market by removing regulatory barriers from divergent national rules that hinder firms and erode trust in cross-border transactions (Council of the European Union, 2024b).

The UCPD serves as a key legal framework for tackling greenwashing in the EU because the **Empowering Consumer Directive** requires that environmental claims, social characteristics, and circularity aspects are included under the UCPD. This Directive addresses explicitly misleading environmental claims, greenwashing, and social impact assertions to improve consumer protection and support the green transition by tackling unfair practices (European Union, 2024; Van Vooren et al., 2024), or as the Belgian Deputy Prime Minister of the Economy and Employment puts it, the new Directive will enable consumers to be better informed, protected, and equipped to contribute to the green transition (Council of the European Union, 2024a). The UCPD, which applies across the EU and for which EU members have until September 2026 to transpose the Directive into national law, prohibits misleading and false advertising (Eikel et al., 2024). Further, the European Commission has increased scrutiny on vague claims like "eco-friendly" and "sustainable," and stricter regulations are anticipated in the near future. The EU also plans to restrict terms like "carbon neutral" unless backed up by clear evidence (Rossi et al., 2024; Trottier, 2024). It targets unfair commercial practices that mislead consumers away from sustainable consumption choices. It also ensures a better and more consistent application of EU consumer rules. It contributes to a circular, clean and green EU economy by enabling consumers to make informed purchasing decisions and, therefore, contribute to more sustainable consumption (Council of the European Union, 2024). Riordan (2024) provides a list of prohibited and misleading practices and product claims under the new Directive, which we have summarized below:

- **Early Obsolescence:** Designing products to become outdated or fail sooner than necessary.
- **Generic Environmental Claims:** Using broad, vague terms like "eco-friendly" or "biodegradable" without clear definitions or evidence.
- **Unaccredited Sustainability Labels:** Display labels that are not backed by independent certification schemes or public authorities.
- **Unsubstantiated Future Performance Claims:** Making future sustainability promises without a detailed, verifiable implementation plan.

- **Irrelevant Feature Advertising:** Highlighting minor features to falsely suggest overall sustainability.
- **Carbon Neutrality Through Offsetting:** Claiming carbon neutrality by buying carbon credits rather than improving emissions.
- **Compliance Claims:** Advertising standard legal requirements as unique sustainability features.
- **Partial Environmental Claims:** Making claims about the environmental benefits of an entire product or business when they apply only to specific aspects or activities.

In conclusion, the amendments to the Empowering Consumers Directive and the Unfair Commercial Practices Directive (UCPD) are crucial in the European Union's Green Deal initiative, which aims for climate neutrality by 2050 (Heywood, 2024). The newly adopted Directive (EU) 2023/2078, also known as the Greenwashing Directive, significantly strengthens existing consumer protection laws to combat misleading environmental claims more effectively. This Directive and the Green Claims Directive set rigorous standards for environmental claims, mandating that they be substantiated by credible evidence and independent certification.

Notable provisions of the Greenwashing Directive include prohibitions on generic environmental claims unless supported by outstanding ecological performance, strict requirements for sustainability labels, and limitations on advertising future environmental performance without detailed, verifiable plans. The Directive also addresses misleading claims about greenhouse gas offsets and prohibits marketing legal compliance as a unique feature. Overall, the Directive aims to enhance consumer protection by providing clear, reliable information, promoting transparency and encouraging more sustainable consumption practices throughout the EU. The Misleading & Comparative Advertising Directive requires that advertisements, including environmental claims, not deceive consumers and must be based on clear, objective, and verifiable evidence. Although the Directive does not explicitly target greenwashing, it ensures that comparative advertising, such as environmental comparisons, is fair and factual. Advertisers must provide substantiated claims and include the methodology used, and they cannot use vague or unverified statements about sustainability to mislead consumers. The Directive thus promotes fair competition and transparency in advertising, ensuring that all claims, including environmental ones, are accurate and evidence based. The newer Greenwashing Directive enhances these standards by imposing stricter rules for substantiating environmental claims and introducing penalties for companies that fail to meet the new requirements. Figure 35 on the next page shows the two core greenwashing legislations (marked with a green star) in the European Union under the new Greenwashing Directive.

At present, EU law does not explicitly address environmental claims. Instead, such claims fall under the broader regulations set by **Directive 2005/29 on Unfair Business-to-Consumer Practices** and **Directive 2006/114 on Comparative Advertising enabled through the new EU Greenwashing Directive and the Green Claims Directive**

NEW: EU Greenwashing Directive (2023/2078)
aims to combat greenwashing by introducing new rules and stricter regulations to enhance transparency by amending existing consumer protection laws to tackle misleading or deceptive practices related to environmental claims.

Works in tandem

NEW: Green Claims Directive (2023/0085/COD)
aims to standardize and strengthen the rules for the environmental claims made by businesses to ensure they are accurate and substantiated. Its primary goal is to provide clear and reliable information to consumers about the environmental impact of products and services.

Amends

Empowering Consumers Directive (2024/825),
aims to empower consumers for the green transition by addressing gaps in the regulation

Builds on

Unfair Commercial Practices Directive (UCPD) (2005/29/EC),
regulates Business-to-Consumer Commercial Practices, establishes rules to protect consumers from unfair, misleading, and aggressive commercial practices, including false or exaggerated environmental claims.

Consumer Rights Directive (CRD) (2011/83/EU)
aims to harmonize consumer protection rules across the EU, particularly for distance contracts, mandating transparency and truthful information

Builds on

Misleading & Comparative Advertising (Directive 2006/114/EC)
aims to protect traders from misleading advertising and sets conditions for permitted comparative advertising. It prohibits ads that deceive or are likely to mislead, including unsubstantiated, exaggerated, or false environmental claims. It can be used to challenge businesses that employ misleading green claims to differentiate from competitors.

Figure 35: Overview of the EU Greenwashing Legislation

COMPARISON OF THE EU UNFAIR COMMERCIAL PRACTICES DIRECTIVE (UCPD) WITH CANADA'S BILL C-59

While the EU Unfair Commercial Practices Directive (UCPD) and Canada's Bill C-59 both address deceptive marketing practices, including greenwashing, they differ in scope, enforcement, and specific requirements. The following is a comparison:

(1) Scope and Coverage: The EU Greenwashing Directive, under the UCPD addresses all sustainability-related claims made in a Business-to-Consumer (B2C) setting, whether these claims concern a product, brand, company, or service.

- It covers **environmental or "green" and so-called "social characteristic"** claims. As a result, the Directive encompasses issues of "greenwashing" and "bluewashing" — a term referring to misleading claims about a company's social responsibility or humanrights commitments. It is expected that the claim "vegan," which is already regulated in the cosmetic sector – will be considered a social claim (Heywood, 2024).
- Further, the European Union has broadly defined "environmental claims." This broad definition of environmental claims means any message or representation not mandatory under EU law or national law that may cover claims related to climate change, energy efficiency, circularity, pollution or biodiversity, among others, falls under the Greenwashing Directive (Heywood, 2024).
- Most recently, the Greenwashing Directive introduced "Prohibited practices," a list of claims always "unfair" and therefore prohibited, whether misleading or not. These unfair claims include "sustainability" labels that are not based on an independent, third-party certification scheme or established by public authorities. The use of generic claims that encompass environmental and social aspects, such as "sustainable," "conscious," or "responsible," cannot be substantiated only based on environmental features; instead, the company has to prove that the product has a recognized excellent environmental and social performance.
- Further claims that a product is carbon neutral, reduced, or positively impacted the environment based on purchasing or cancelling so-called carbon credits (e.g., carbon offsets from forestry-based removal projects) will be prohibited (Heywood, 2024).
- The European Union is finalizing its Green Deal legislation with an amendment to the Consumer Rights Directive (CRD) and the Unfair Commercial Practices Directive (UCPD) that regulates all forms of "unfair" commercial practices that affect consumer choices, including environmental ones.

In contrast, Canada's Bill C-59, integrated within the Competition Act, focuses specifically on misleading advertising, including greenwashing. Like the Greenwashing Directive, it applies to all forms of advertising but emphasizes claims that directly mislead or deceive consumers. Bill C-59 mainly targets false or exaggerated environmental claims. It includes provisions for civil and criminal penalties for deceptive practices but significantly emphasizes providing consumers with truthful and clear information (Rossi et al., 2024; Trottier, 2024).

(2) Enforcement: Enforcement of the UCPD in the EU is carried out by national consumer protection authorities in each EU member

state. These authorities can take action against companies for making false or misleading claims, including greenwashing. Penalties vary depending on the member state as long as they are effective, proportionate and dissuasive (European Union, 2024); however, the UCPD empowers regulators to impose fines, require companies to withdraw misleading claims, and take other corrective measures. The European Commission also monitors compliance and provides guidance, though individual states take the lead in enforcement (Rossi et al., 2024; Trottier, 2024). In contrast, The Competition Bureau in Canada enforces Bill C-59 and can launch investigations and impose significant fines for deceptive green claims. However, private entities will also be able to take legal action against companies for misleading claims starting in 2025 (Rossi et al., 2024; Trottier, 2024).

(3) Consumer Protections: The UCPD, in conjunction with the Green Deal, is comprehensive, focusing on protecting consumers from a wide range of deceptive practices, including greenwashing.

Consumers are protected against direct falsehoods and omissions of important information that could mislead their purchasing decisions. The "general impression" test is often applied, meaning even if a claim is technically true, it can still be considered misleading if it gives consumers the wrong impression. Although Canada's Bill C-59 is also consumer-focused, its enforcement focuses specifically on advertising practices likely to mislead consumers. It takes a strong stance on environmental claims, ensuring that businesses provide full transparency. The Bill also includes provisions allowing consumers and organizations to file complaints directly to the Competition Tribunal from 2025 (Rossi et al., 2024; Trottier, 2024).

(4) Penalties: Penalties under the UCPD are determined at the national level, with significant variations between member states. Some countries impose fines, while . others may require corrective actions such as removing misleading claims from the market or issuing public corrections. In contrast, Canada's Bill C-59 sets specific financial penalties for greenwashing violations. Fines can reach up to $10 million for first-time violations and $15 million for repeat offenders, making it one of the more stringent frameworks for financial penalties (Rossi et al., 2024; Trottier, 2024).

(5) International Impact and Alignment: The UCPD applies across the European Union, making it a major regulatory framework influencing international businesses. Companies doing business in the EU must align their marketing practices with UCPD standards, ensuring that all environmental claims are accurate and verifiable, while Canada's Bill C-59 is limited to Canada. However, Bill C-59 aligns with international efforts to curb greenwashing, mainly through its partnership with other countries' regulatory bodies. Canada increasingly collaborates with the EU, the US, and other regions to create a consistent global approach to preventing deceptive marketing.

In conclusion, the EU UCPD and Canada's Bill C-59 are designed to combat greenwashing and protect consumers from misleading environmental claims. The UCPD is part of a broader consumer protection framework with varying enforcement across EU member states, while Bill C-59 takes a more centralized, stringent approach with significant penalties for violations. Both aim to ensure

businesses provide truthful and transparent information, though Bill C-59 offers more specific and severe financial consequences for greenwashing (Rossi et al., 2024; Thiboutot et al., 2024; Trottier, 2024).

In the following section, we will provide a summary of key countries with notable legislation:

THE UNITED KINGDOM

The Green Claims Code, launched in 2021 by the UK's Competition and Markets Authority (CMA), which is a non-ministerial regulatory body, delivers effective enforcement “to deter wrongdoing, protect consumers and educate businesses” (Arbor, 2024). The Green Claims Code sets out guidelines to ensure truthful, accurate, and substantiated environmental claims. These The Green Claims Code, launched in 2021 by the UK's Competition and Markets Authority (CMA), which is a non-ministerial regulatory body, delivers effective enforcement “to deter wrongdoing, protect consumers and educate businesses” (Arbor, 2024). The Green Claims Code sets out guidelines to ensure truthful, accurate, and substantiated environmental claims. These guidelines mean claims must be correct and capable of being substantiated, clear and understandable. Further, claims must be “complete” without hiding important information; they must be meaningful and fair compared to other products or services. (Government United Kingdom, 2023). The CMA emphasizes that claims must not exaggerate environmental benefits and should consider the entire lifecycle of the product. If businesses fail to comply, they risk fines or other legal actions (Arbor, 2024; Conscious Insider, 2024; Rossi et al., 2024). The CMA is also actively investigating industries, such as fashion, for misleading green claims, as fashion is one of the most harmful industries and least policed (Arbor, 2024).

THE UNITED STATES

The Federal Trade Commission (FTC) introduced the Green Guides in 1992 to provide businesses with guidelines for environmental marketing claims with updates in 1996, 1998, and 2012 (Federal Trade Commission, 2012). The FTC can issue fines and penalties for violations, but enforcement tends to be less aggressive than in the EU or UK. Since 2023, FTC has been working on a review and updating its guidelines, with an updated revision expected in 2024 (Gigounas et al., 2023). The Commission is considering whether the Green Guides should be converted into formal rules, which could be enforced with significant financial penalties for non-compliance. Further, the update should reflect new concerns like carbon offsets and climate impact, including the terms “net zero,” “carbon neutral,” and low carbon.” It is expected to cover recyclability claims and recycled content.

Updated definitions are expected on guidance for terms such as organic, sustainable, compostable, degradable and ozone-friendly (H2Compliance, 2024; Gigounas et al., 2023).

AUSTRALIA

The Australian Competition and Consumer Commission (ACCC) enforces greenwashing laws under the Australian Consumer Law. The ACCC has prioritized environmental claims in recent years,

focusing on ensuring that businesses do not overstate their sustainability efforts. Companies that engage in greenwashing can face significant fines, and the ACCC actively investigates industries with a history of misleading environmental advertising. Legislation is built on eight key principles to avoid greenwashing (Greenwashing Guidance).

These are: make accurate and truthful claims and avoid exaggerating environmental benefit; have evidence to back up your claims which require independent third-party certifications; avoid broad and unqualified claims, for example, “recyclable” as they may depend on the consumer’s action or location, where the product is sold; use clear and easy-to-understand language, avoid technical or scientific language and make sure visual elements should not give the wrong impression. Be direct and open about your sustainability transition and be realistic about achievable changes (Australian Competition & Consumer Commission, 2023). The ACC can release environmental penalties for corporations, up to AU$50 million, or 30% of annual turnover during the breach period, or three times the gain (Guirguis et al., 2023).

FRANCE

France’s Climate and Resilience Law was passed in 2021 and was going into effect in 2023. The law's implementation offers a voluntary environmental labelling phase in 2024 before becoming mandatory in 2025. With the Climate and Resilience Law, France has taken a significant step by introducing legislation on greenwashing. This law addresses the misleading use of environmental terminology in advertising by explicitly banning companies from making deceptive claims about a product’s environmental impact or environmental commitments. Like the upcoming EU-wide Greenwashing Directive, France’s law imposes a higher burden of proof on companies regarding carbon neutrality claims. These claims are only permitted if supported by a detailed report covering all greenhouse gas emissions associated with their product or service, including direct and indirect emissions. Companies must comprehensively explain how they avoid, reduce, and offset these emissions. Therefore, France’s Climate and Resilience Law is a crucial part of its broader strategy to fight climate change, aligning with its goal of achieving carbon neutrality by 2050 (Jousseaume, 2022).

This legislation is notable for requiring mandatory reporting on emissions throughout a product's life cycle. By allowing only net zero claims supported by thorough evidence, accountability standards are set to improve. With two years to implement the Directive, EU member states must adopt similar, stricter regulations (Riordan, 2024).

THE NETHERLANDS

In the Netherlands, consumer protection laws are applied to prevent greenwashing. Dutch authorities are actively pursuing cases against misleading green claims, particularly in the energy and financial sectors. Dutch regulators have investigated companies for falsely claiming carbon neutrality and sustainability in their marketing efforts, with legal consequences for offenders.

The Netherlands has taken proactive steps to combat

greenwashing through various regulations, aligning with European Union directives on consumer protection and environmental sustainability. While there isn’t a specific "greenwashing law" unique to the Netherlands, the country enforces EU-wide legislation like the Unfair Commercial Practices Directive (UCPD), supplemented by national laws and guidelines. Key elements of Dutch greenwashing legislation include:

(1) Adherence to EU Legislation:

- The Netherlands implements the Unfair Commercial Practices Directive (UCPD) (Directive 2005/29/EC), which prohibits misleading environmental claims. This Directive ensures businesses do not deceive consumers with vague or unsubstantiated environmental claims such as "eco-friendly" or "green" (EUR-Lex, 2005).
- The Netherlands is also bound by the new EU Directive 2024/825, which introduces stricter regulations on environmental claims to tackle greenwashing. This includes requiring businesses to provide clear evidence for claims like "carbon neutral" (EUR-Lex, 2024).

(2) Dutch Advertising Code (Reclame Code):

- The Dutch Advertising Code Authority (Stichting Reclame Code, SRC) has developed specific guidelines for environmental advertising under the Dutch Advertising Code for Environmental Advertising (Milieu Reclame Code). This code requires that environmental claims must be clear, accurate, and verifiable (SRC, 2024). Businesses making environmental claims must ensure that their advertising does not mislead consumers by overstating the environmental benefits of their products (SRC, 2024).

(3) Enforcement by the Authority for Consumers and Markets (ACM):

- The Netherlands Authority for Consumers and Markets (ACM) plays an active role in monitoring and enforcing regulations against greenwashing. ACM closely monitors companies making environmental claims, ensuring these claims are supported by concrete evidence (ACM, 2024).

(4) Penalties for Non-Compliance:

- Companies found guilty of greenwashing face significant penalties, including financial fines and reputational harm. The ACM has the authority to impose fines on businesses that mislead consumers with false environmental claims (ACM, 2024).

(5) Consumer Protection:

- Dutch consumer protection laws, aligned with EU directives, ensure that consumers receive accurate and reliable information about the environmental impact of products and services. These laws empower consumers to make informed choices and protect them from deceptive marketing practices (ACM, 2024).



This image was AI-generated and may contain approximations or artistic interpretations.

KEY TAKEAWAYS & INSIGHTS

Countries in the European Union, the UK, and France have implemented some of the strictest laws against greenwashing, with clear guidelines, heavy penalties, and active enforcement. Other regions, such as Canada and Australia, have also adopted strong measures, though enforcement may vary. While the United States has detailed guidelines through the FTC Green Guides, it is generally less strict in enforcement, though this could change as consumer demand for transparency increases.

France’s Climate and Resilience Law was passed in 2021 and includes strict greenwashing provisions. Businesses must provide detailed and transparent evidence for any environmental claims or face severe fines. The law also introduced a new requirement for companies to disclose the environmental impact of their products. Greenwashing can lead to fines of up to €100,000 for misleading claims, making France one of the strictest countries in terms of anti-greenwashing enforcement (McMillan LLP).

RECOMMENDATIONS FOR THE COMPETITION BUREAU

This study examined greenwashing claims found through both in-store campaigns and products, including product descriptions and labels/ hang tags, and less on the packaging. However, greenwashing also occurs on brand websites, including corporate social responsibility reports and social media platforms. While these platforms have significantly decreased the costs and time required to share information, they also facilitate the fast distribution of greenwashing claims. However, they have not been part of this study, nor have we looked into social responsibility reports. Hence, most of our examples and recommendations are based on cases seen in brick-and-mortar and online stores, as well as products, labels, and hang tags on products. Further, we did not explicitly examine business models that put profits over people and the environment, which Scanlan (2017) describes as potentially the greatest greenwashing sin

COMMUNICATION IS KEY

To foster a competitive culture in Canada, it is crucial for all Canadians to have equal access to and understanding of the guidelines and resources available on the government’s website. In the fashion industry, both consumers and professionals often struggle to grasp the concept of "sustainable fashion." A study by Hur and Cassidy (2019) involving 50 professional fashion designers revealed a lack of consensus even among designers regarding what "sustainable fashion" truly means. While consumers may intuitively recognize that sustainable fashion is better for the planet, people, and animals, the specifics of what "better" entails remain ambiguous.

Is sustainable fashion merely "less bad," or does it actively contribute positively to the environment and society? Does it address issues such as animal rights, gender-based violence, inclusivity, recycling, organic materials, circularity, and chemical use? Without a clear definition, the term becomes subjective, varying from person to person and context to context (Henninger et al., 2016). This lack of understanding underscores the need for the Bureau's website to provide clear, industry-specific guidance on sustainable fashion, complete with concrete examples that assist both professionals and consumers. The current framework, which is too broad

Moreover, many individuals struggle to comprehend the term "sustainable" itself. The EU addresses this challenge through the Empowering Consumers Directive (EU 2024/825), which stipulates that claims using the term "sustainable" must encompass both environmental and social attributes, rather than focusing solely on ecological performance. This requirement aligns with Canada’s Modern Slavery Legislation (Bill S-211), which aims to eradicate all forms of modern slavery. By ensuring that sustainability claims address both environmental and social dimensions, the Directive helps prevent "bluewashing," or misleading claims about social responsibility. Consequently, any new Canadian legislation on greenwashing should also consider both pillars of sustainability.

In the following section, we will provide examples of false and misleading representations related to Deceptive Marketing Practices under the Competition Act, which applies broadly to all marketing and advertising claims made by businesses. Additionally, we will outline misleading labelling practices, offer guidance on avoiding deceptive marketing under the Consumer Packaging and Labelling Act, and highlight challenges in labelling products according to the Textile Labelling Act. These examples aim to stimulate discussion on greenwashing and support the development of a robust and effective regulatory framework for Canada.

CLARIFYING FALSE OR MISLEADING REPRESENTATIONS: NAVIGATING DECEPTIVE MARKETING UNDER THE COMPETITION ACT

Companies use a variety of topics and greenwashing claims to boost sales and gain an advantage over competitors. We will focus on two examples: the marketing of "vegan" and "biodegradable" products to explain how consumers are misled and to show the need for education for consumers and the industry. However, this is just a selection; other common topics include carbon offsetting, circularity, etc.

Vegan

While a "vegan diet" means plant-based, in the fashion industry, it has become common practice to advertise synthetic or artificial leather substitutes made from materials like PVC (Polyvinyl Chloride) or PU (Polyurethane) as "vegan" or "cruelty-free" leather. This practice is misleading, as these materials are not plant-based.

Additionally, the term "cruelty-free" is also misleading. Although the material may be produced without direct harm to animals, it cannot be considered cruelty-free if manufacturing releases harmful substances that negatively impact workers' health. Under the European Union's Unfair Commercial Practices Directive (UCPD), "vegan" is regarded as a social claim, meaning it carries social or ethical implications beyond the product's physical properties. A social claim involves the product's adherence to ethical standards, including animal welfare and labour practices.

Furthermore, the use of the term "leather" for synthetic materials is problematic. Traditional leather is derived from animal hides and is biodegradable, whereas PU or PVC-based materials are not. These synthetic alternatives break down into microplastics that accumulate in the environment and cannot be recycled effectively.

Hence, materials made from PVC or PU should not be allowed to be marketed as leather. We recommend establishing clear guidelines for labelling materials made from PVC or PU.

In recent years, the industry has made progress in replacing PVC or PU with "more sustainable" substitutes, such as those marketed as plant-based leather (e.g., pineapple or grape leather); however, often only a small percentage of the content is plant-derived, with the majority being synthetic; hence it is essential to guide the industry how these new materials can be market.

Biodegradable

There has been a concerning increase in false or misleading environmental claims regarding the biodegradability of garments. Many consumers are led to believe that clothing can easily biodegrade, presenting this as a

straightforward solution to the global textile waste crisis. These claims often neglect to address the chemicals and hazardous substances used in garment production, as well as the fact that even 100% cotton T-shirts are frequently sewn with synthetic threads that do not biodegrade. Additionally, most municipalities lack the necessary infrastructure to properly biodegrade clothing Such misleading claims can have serious consequences, encouraging consumers to dispose of their clothing in green bins and sending items to composting facilities ill-equipped to handle textiles. We argue that most assertions about biodegradability and recycling are deceptive, fostering the false belief that garments can be easily broken down or recycled at the end of their lifecycle.

To address this issue, we recommend that the Competition Bureau establish clear guidelines for all aspects of circularity, including standards for biodegradable, compostable, and recyclable materials. This would provide essential education for both consumers and the industry regarding specific requirements, helping to mitigate the prevalence of misleading claims.

GUIDELINES FOR ACCURATE LABELLING: PREVENTING DECEPTIVE MARKETING UNDER THE CONSUMER PACKAGING AND LABELLING ACT

A significant portion of greenwashing in advertising hinges on appealing yet vague claims, often using buzzwords like "eco-friendly" or "safe for the environment." These terms can be interpreted in various ways, leading to confusion and potential deception. In addition to commonly used terms such as "vegan" and "biodegradable," many other vague claims circulate in the market, including "conscious," "circular," "recyclable," "feel good," "made with the planet in mind," "supports life," "better for the climate," and "truly sustainable." We believe it would be beneficial for the Competition Bureau to provide more examples of misleading claims to help consumers navigate this landscape.

While many companies seek to showcase their commitment to sustainability, their claims often pertain to product composition, production processes, disposal, comparisons, and future goals. Businesses may assert that their products are made from recycled materials, produced using renewable energy, or are recyclable; however, these claims can be misleading if not adequately substantiated. Comparative claims might highlight a reduced environmental impact compared to previous models or competitors, while some businesses make promises about future achievements, such as becoming carbon neutral, without presenting a credible plan to achieve these goals.

These various types of claims underscore the necessity for clear, substantiated, and specific information to prevent greenwashing.

We analyzed a hang tag from a pair of denim jeans found in a store that highlights several "sustainability benefits." However, even this term can be misleading, as it often focuses on environmental aspects while overlooking social considerations. The claims listed include:

- Vertical integration
- Eco-friendly manufacturing with Laser & Ozone technology
- Energy/water-saving washing machines
- Heat recycling dryers
- Washed with sustainable ingredients & recycled water

While the overall message of this hang tag is that this product is made with the environment in mind, or that itis good for the environment, it is worth having a closer look at the individual statements to explore the greenwashing case:

Vertical integration is often used to describe a company's control over its supply chain, but it is not inherently tied to environmental benefits. Simply stating vertical integration does not automatically mean the processes involved are better for the environment. Let’s assume the vertical integration addresses reduced transportation because all production processes take place at the same location. In this case, the statement ignores that transportation usually has a relatively low environmental impact compared to consumer care and fibre production. The exact energy savings are not specified, nor is it clear how these savings compare to the total energy required to produce the garment.

Eco-friendly manufacturing with Laser & Ozone technology: While this claim explains the technology used by the company to achieve a specific look and feel for the garment, it fails to provide any information about the environmental benefits. Although laser and ozone technologies may be preferable to sandblasting—which is banned in many countries, including the UK, or subject to strict regulations—this context is overlooked. Consequently, laser and ozone technology no longer stands out as unique. The term "eco-friendly" remains vague and unsubstantiated without clear data or certifications to support it.

Energy/water-saving washing machines: While this claim suggests reduced resource usage, concrete figures are needed to support it. For example, how much energy or water is being saved, and how does it compare to standard washing processes? Without these details, there is no evidence. The critical fact that this claim hides is that making this garment required energy and water.

Heat recycling dryers: Like washing machines, heat recycling dryers can be more energy-efficient, but again, the claim requires specific data to verify the extent of the savings. Without this information, the claim is misleading consumers.

Washed with sustainable ingredients & recycled water: What are the "sustainable ingredients"? Are they certified? How much recycled water is used in the process? These terms are broad and need further explanation. Vague claims like "sustainable" and "recycled" are common in greenwashing because they sound positive but lack the specifics needed for transparency.

The label’s detailed listing of multiple benefits suggests that the company has made significant efforts to produce a garment with a low environmental impact, giving an impression of environmental friendliness. However, none of the environmental benefits are clearly articulated. The core issue with such claims is the lack of adequately substantiated terminology. Without third-party certifications, specific data, or independent verification, these claims can mislead consumers—a classic example of greenwashing. Consumers may mistakenly believe that purchasing the product has a more substantial positive environmental impact than it actually does.

Under the recent amendments from Bill C-59, misleading environmental claims like those

in this example are subject to increased scrutiny, and companies making such claims without sufficient evidence could face penalties under the Competition Act for deceptive marketing practices. While the list of "sustainability benefits" is impressive, it is noteworthy what sustainability issues are omitted.

The textile label indicates that the garment consists of 92% cotton, 6% polyester, and 1% spandex. The fibre content is crucial, as it is the most significant factor influencing a garment's environmental impact, aside from consumer care. Given this, why did the company opt for a fibre blend that complicates recycling? Furthermore, the use of conventional cotton raises concerns about water consumption, depending on the growing region.

We argue that any environmental claims made in marketing should only be asserted if the entire lifecycle of the garment has been assessed and the environmental benefits are genuinely significant. Highlighting select attributes does not provide an accurate picture of the garment's overall environmental impact and can be misleading. This perspective aligns with the UK's Green Claims Code, which emphasizes that environmental claims should not exaggerate benefits and must consider the entire product lifecycle.

This example of the denim pants hang tag illustrates the complexity of both evaluating the sustainability of a garment and the challenge of communicating it. Companies have two main approaches to conveying their sustainability efforts:

- Free-form Sustainability Communication: This method involves sharing sustainability initiatives without standardized guidelines, which carries the inherent risk of greenwashing.
- Third Party Certifications and Codes of Conduct: Companies can also communicate their sustainability efforts by obtaining third-party certifications (e.g., Oeko-Tex, GOTS) or implementing codes of conduct audited and certified by independent bodies. This approach provides more structured and verified claims.

A crucial revision to bolster the Competition Bureau's ability to protect and promote competition—benefiting both consumers and businesses—is the new mandate requiring companies to substantiate specific environmental claims through testing or evidence. This requirement aligns with the EU's Empowering Consumers Directive (EU 2024/825), stipulating that sustainability labels must be accredited by public authorities or based on independent certification schemes. The results of our study showed that only 31% percent of participants had seen eco-certifications on clothing they purchased; this means that the vast majority of sustainability claims are free-form communications. Hence, there is an opportunity for the number of eco certifications on textile products to increase; however, third-party accreditations also include challenges.

THIRD-PARTY CERTIFICATIONS

While third-party accreditations enhance credibility, facilitate comparison, and improve product identification, they come with drawbacks. These certifications can be costly and time-consuming, posing financial challenges for smaller brands. Additionally, they often focus on specific aspects of

sustainability and may not be universally recognized or understood by all consumers. Our survey highlights this issue, as participants frequently struggle to identify even well-known eco-labels.

This confusion is compounded by the sheer number of eco-labels available: the US alone has around 53 for textiles (Ecolabel Index, 2024), while the European Commission reports 92, with nearly 10,000 certified products representing 10% of all eco-certified items (European Commission, 2024). This proliferation makes it difficult for consumers to effectively use eco-labels to verify sustainability claims and combat greenwashing.

Let's explore the differences between two prominent cotton certifications: "Better Cotton" from the Better Cotton Initiative (BCI) and "Organic Cotton" certified by the Global Organic Textile Standard (GOTS). Each certification embodies distinct environmental practices and impacts.

The primary challenge for consumers is determining the true value of eco-certifications.

Better Cotton aims to reduce chemical usage by encouraging farmers to limit pesticides, synthetic fertilizers, and water consumption. However, it does not mandate the complete elimination of these inputs, allowing for a transitional approach that can still incorporate conventional methods. Additionally, Better Cotton permits genetically modified seeds and synthetic chemicals, as long as their use is minimized.

In contrast, GOTS-certified organic cotton requires that cotton be grown without synthetic pesticides, herbicides, or fertilizers, leading to a significant reduction in soil and water contamination. GOTS also strictly prohibits genetically modified organisms (GMOs), ensuring that only non-GMO seeds are used.

These differences underscore the complexity of sustainability certifications and the challenges consumers face in using eco-labels as reliable indicators of environmental claims. With a plethora of labels available, it can be difficult for consumers to determine which certification truly reflects superior environmental practices. While consumers may encounter both standards, it often remains unclear which one aligns with higher environmental criteria. This complexity raises critical questions about how consumers can make informed choices based on eco-labels and avoid being misled.

Researchers have emphasized that environmental marketing must address the varied and dynamic contexts in which purchasing decisions are made (Leire & Thidell, 2005). Participants of our study buy garments based on style, comfort, and fit at the point of sale. They need immediate information on the environmental impact of their choices—rather than having to research eco-labels after leaving the store. To address this, we propose that the Competition Bureau offers clear guidance on eco-labels on its website. This guidance should include descriptions of each eco-label's significance and a scoring system to indicate which labels represent higher environmental standards.

We believe the fashion industry needs greater transparency and traceability in the supply chains of Intermediate Raw Textile Substances (IRTS) to effectively combat

greenwashing. IRTS refers to materials—such as fibres, yarns, and fabrics—that undergo multiple processing stages before becoming finished products.

Multi-stakeholder initiatives are increasingly focused on establishing guidelines and standardizing traceability systems. For example, the UNECE-UN/CEFACT project aims to enhance transparency and traceability in the garment and footwear sectors by developing policy recommendations, implementation guidelines, and a comprehensive traceability toolbox. This toolbox incorporates open-source blockchain solutions and DNA tracing technologies to improve product verification and supply chain transparency.

We encourage the Competition Bureau to explore the implementation of a robust traceability system that provides consumers with all relevant information at the point of sale. This initiative would empower consumers to make informed choices and hold brands accountable for their environmental claims.

Codes of conduct typically outline the eco-labels and standards that a company commits to in order to measure and report its sustainability progress. These standards should be grounded in scientific targets and backed by credible evidence. However, the question arises: who possesses the expertise to substantiate these claims, and what specific scientific standards should companies adhere to?

The recent amendments to Bill C-59 empower private parties—such as consumers and competitors—to bring claims regarding deceptive marketing practices directly to the Competition Tribunal. However, for these parties to effectively challenge misleading claims, they need access to clear guidelines on the scientific criteria that must be met.

While many experts agree that ecological claims should be supported by measurable scientific targets and data, the lack of consensus on which standards to adopt creates uncertainty. Therefore, we urge the Competition Bureau to provide recommendations on the appropriate scientific standards that companies should follow to substantiate their environmental claims. This would not only enhance accountability but also empower consumers and competitors to engage more effectively in the marketplace.

RECOMMENDATIONS FOR WARRANTIES & GUARANTEES UNDER THE COMPETITION ACT:

RIGHT TO REPAIR

Many companies provide spare buttons with garments, which can be helpful for hand-sewn buttons. However, this practice can be misleading, especially or snap buttons that require specialized tools and moulds for reattachment—resources typically unavailable to consumers.

As a result, consumers may be left with the false impression that these garments are easily repairable.

RIGHT TO DURABLE GARMENTS

While we support the "Right to Repair" movement, the clothing industry faces a significant challenge: the cost of professional repairs often exceeds the initial purchase price, making them seem unworthy of investment. Furthermore, many consumers have lost the skills necessary for basic repairs, such as sewing on a button or fixing a hem (Lundberg et al., 2024). In

fashion, durability often outweighs repairability, yet there is a lack of transparency regarding a garment's expected lifespan. Improved communication about the longevity of clothing is essential.

When it comes to durability—especially concerning components like buttons—it is crucial that they remain securely attached after only a few uses. However, the issues of durability and repairability go beyond warranties and guarantees. Many products are marketed as "high quality" or "best quality" without providing any substantiated evidence to support these claims.

RIGHT TO WASH

We also need to address the labelling of garments, particularly T-shirts and sweaters, as not washable for hand or machine washing. Sometimes, no alternative dry-clean-only instructions are provided, leaving consumers without clear guidance. While care instructions are not mandatory under the Textile Labelling Act, we argue that garments worn directly against the skin should be washable, with very few exceptions (e.g., evening dresses adorned with rhinestones). It is irresponsible to leave consumers to navigate the risks of damaging a garment during washing or dry cleaning, a fundamental expectation for any clothing item.

Washing and drying significantly impact a garment's lifespan, yet quality issues like twisting or "torquing" can occur even when care instructions are followed. Unfortunately, consumers cannot predict whether a shirt will twist before purchase. Protecting

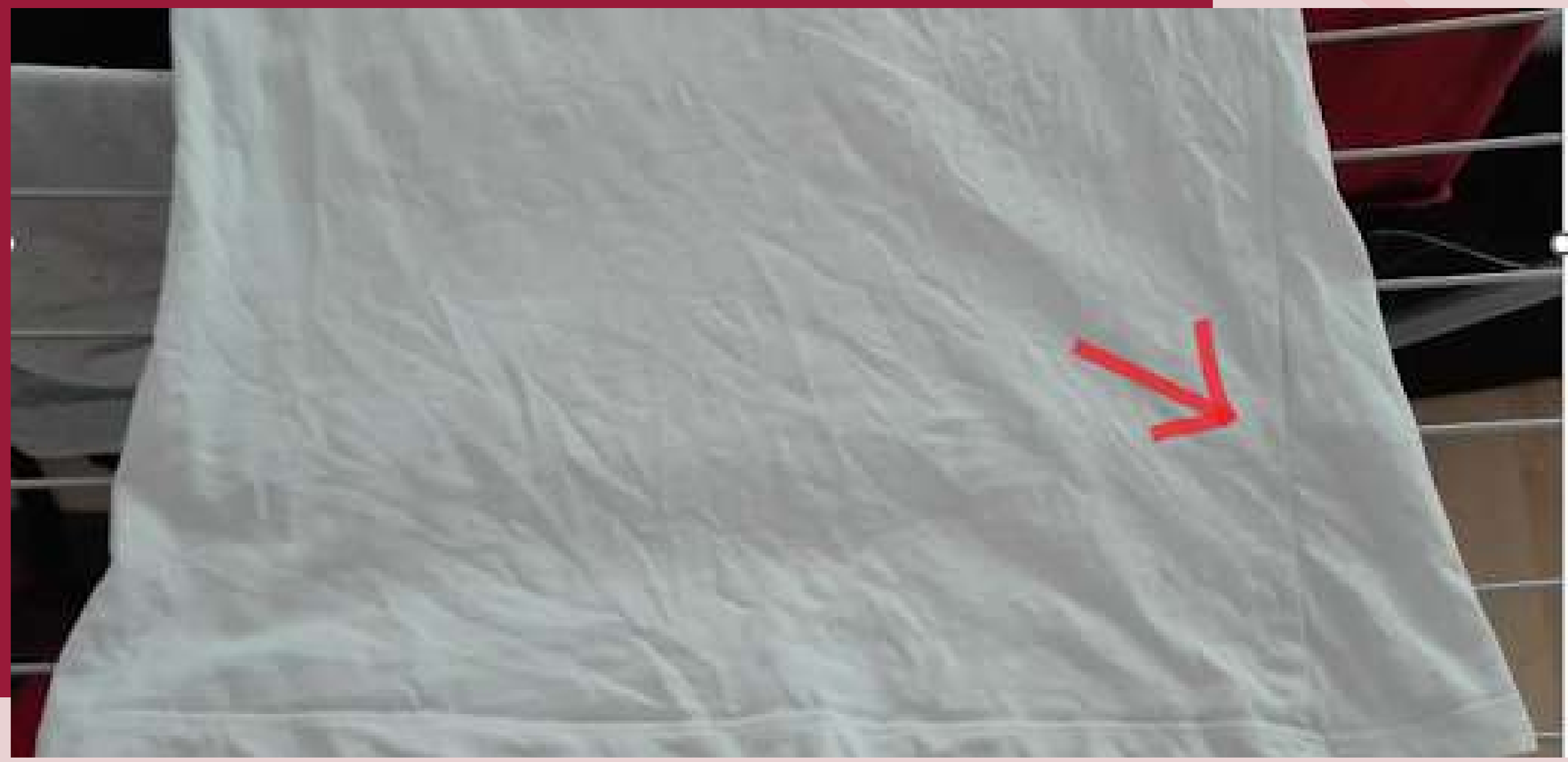


Figure 36: T-shirt with twisted side seams

consumers from hidden quality flaws that compromise durability and sustainability is vital. Clear care guidance and transparency regarding potential quality issues empower informed purchasing decisions and support long-term wearability.

RECOMMENDATIONS FOR CONSIDERATIONS UNDER THE TEXTILE LABELLING ACT

FIBRE COMPOSITION & OTHER FIBRES

Regarding fibre content, a label must list all fibres by weight, which must be expressed as a percentage of the entire article or of a particular section of the article. This percentage must appear immediately before or following the generic name of the fibre. The fibres must be listed in descending order, for example, “50% cotton, 30% polyester, 20% viscose”. All fibres must add up to 100%.

Fibres that make up less than 5% of the total weight do not need to be listed by name but may be designated as “other fibres.” For example, it is legitimate to say a garment is made from 95% cotton and 5% other fibres – if the garment is made from 95% cotton, 3% elastane and 2% polyester.

The regulation becomes particularly crucial when a garment is labelled as recyclable or biodegradable, especially when unspecified "other" fibres may limit the material's true recyclability or biodegradability. To address this issue, garment labels should explicitly list all fibres, ensuring a complete inventory for consumers.

Additionally, there should be a stronger emphasis on minimizing the use of elastane or spandex, which are frequently included in quantities below 5% and may not be required to be disclosed on textile labels. Despite their small presence, these fibres can significantly hinder the end-of-life processing of garments, particularly regarding recycling and circularity. Clear guidelines should be established to enhance transparency and support more sustainable practices in the fashion industry.

FEEDSTOCK FOR RECLAIMED FIBRES

When a generic fibre is classified as reclaimed, the terms “reclaimed,” “reprocessed,” or “reused” must be clearly indicated before the fibre’s name. However, the Textile Labelling Act does not mandate disclosure of the feedstock for reclaimed fibres, leaving consumers in the dark about their origins.

Textile recycling is often marketed as a guilt-free shopping solution. In our survey, we asked participants about the fate of donated clothing that doesn't sell locally. While 46% believed these garments were distributed to community shelters in Canada, 30% thought they were recycled into new textile products.

The rise of recycled polyester labelled as “recycled” or “reclaimed” can mislead consumers into thinking these fibres originate from discarded garments, rather than from plastic packaging, which is typically the case. Although recycled polyester from plastic packaging is more expensive than virgin polyester, recycled fibres from used garments are even pricier. This lack of transparency regarding the feedstock’s origin not only confuses consumers but also undermines efforts to promote genuine textile recycling practices. Clear labelling and education about the source of recycled materials are essential to foster informed consumer choices and support

sustainable practices in the fashion industry.

PURPOSE & LIMITATION OF TEXTILE LABELLING

In our study, 73% of participants reported that they check the fibre content on textile labels to assess sustainability claims. While natural fibres are frequently viewed as "sustainable" and desirable, they do not reliably indicate overall sustainability, as they do not account for the chemicals used or the labour conditions involved in production.

There is a pressing need for clearer communication about the purpose of these labels, emphasizing that they solely provide information about fibre content and have limitations in reflecting a garment's overall sustainability. Furthermore, fashion industry professionals would greatly benefit from guidance on selecting preferred fibres with a lower environmental impact. This could help create a more informed approach to sustainability in fashion, enabling both consumers and industry stakeholders to make better choices.



This image was AI-generated and may contain approximations or artistic interpretations.

STRENGTHENING GREENWASHING POLICIES: FINAL RECOMMENDATIONS

The amendments to the Competition Act (Bill C-59) present a crucial opportunity to tackle the pervasive issue of greenwashing in the fashion industry and to accelerate its progress toward sustainability. However, implementing effective sustainable practices is complex and often requires specialized knowledge that many stakeholders lack. A significant number of Canadian consumers remain unaware of greenwashing tactics and struggle to understand the terminology used to identify misleading claims. Likewise, industry employees outside of top management often lack the expertise to discern genuine sustainability efforts.

To navigate these challenges, the Competition Bureau must provide clear, industry-specific guidance, including accessible definitions of key terms, relevant standards, and concrete examples of how to accurately communicate sustainability improvements. Relying solely on third-party certifications may not be sufficient. Currently, the fashion industry grapples with transparency and traceability issues that hinder the substantiation of sustainability claims, leading some companies to hesitate in making such claims. This hesitancy often arises from fears of being accused of greenwashing, concerns about not meeting evidence standards, or the risk of “brownwashing.”

To effectively address these concerns, we recommend that the Competition Bureau establish a task force comprising fashion industry experts to develop aligned guidelines and best practices. This collaborative approach would help ensure that regulations are both realistic and actionable, encouraging companies to pursue authentic sustainability improvements without the fear of punitive repercussions.

REFERENCES

Agro, C., & Matteis, S. (2023, October 27). Why so much recycled clothing is still going in the garbage | CBC news. CBCnews. https://www.cbc.ca/news/business/marketplace-recycled-clothing-garbage-1.7009225

Agro, C., Matteis, S., & Cowly, J. (2021, October 1). Experts warn of high levels of chemicals in clothes by some fast-fashion retailers | CBC News. CBCnews. https://www.cbc.ca/news/business/marketplace-fast-fashion-chemicals-1.6193385#:~:text=A%20Marketplace%20investigation%20found%20that,phthalates%20—%20that%20experts%20found%20concerning.

Arbor. (2024). What Is The UK Green Code and Why You Should Be Paying Attention. https://www.arbor.eco/blog/uk-green-code-fashion-sustainability-act#:~:text=This%20code%20is%20a%20legal,and%20the%20way%20it%20acts.

Australian Competition & Consumer Commission (ACM). (2023). ACCC releases eight principles to guide businesses' environmental claims.https://www.accc.gov.au/media-release/accc-releases-eight-principles-to-guide-businesses%E2%80%99-environmental-claims

Benchetrit, J. (2024, May 7). *Competition Bureau investigating lululemon over greenwashing allegations | CBC News*. CBCnews. https://www.cbc.ca/news/business/lululemon-greenwashing-investigation-competition-bureau-1.7194913#:~:text=%22There%20is%20no%20conclusion%20of,Stand

Berliner, D., & Prakash, A. (2015). "Bluewashing" the Firm? Voluntary Regulations, Program Design, and Member Compliance with the U nited N ations G lobal C ompact. *Policy Studies Journal, 43*(1), 115-138.

Canopy. (2024). *Pack4Good* https://canopyplanet.org/campaigns/pack4good/

Comparative analysis of 33 countries. Global Environmental Change, 23(5), 1001-1008.

Conscious Insider (2024). *15 Sustainable Fashion Certifications & Labels You Can Trust (2024)*. https://theconsciousinsider.com/sustainable- fashion-certifications-labels/

Constable, H. (2024). *Your brand new returns end up in landfill*. BBC Earth. https://www.bbcearth.com/news/your-brand-new-returns-end-up-in-landfill

Cosentino, C. (2025). Photo of Greenwashing in the fashion industry [Photograph]. In S. Weber, S. Shawn, C. Caren Chan, I. Maldonado Quiroz, V. Profiti, & N. Gonzalez Varon, Greenwashing in the fashion industry [Art Installation]. Seneca Polytechnic, Toronto.

Council of the European Union (2024a). *Consumer rights: final approval for the Directive to empower consumers for the green transition*. European Council. Consumer rights: final approval for the Directive to empower consumers for the green transition

Council of the European Union (2024b). *Directive (EU) 2024/825 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*. European Sources Online. Directive (EU) 2024/825 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

Cradle to Cradle Products Innovation Institute. (2024). Cradle to cradle certified®. Cradle to Cradle Certified® . https://c2ccertified.org/the-standard

Delmas, M. A., & Burbano, V. C. (2011). The drivers of greenwashing. California management review, 54(1), 64-87.

Ecolabel Index. (2024). All ecolabels in United States on textiles. Big Room Inc. https://www.ecolabelindex.com/ecolabels/?st=country=us;category=textiles

Eikel, C., Massalongo, S., Tardiolo, R., & Kaldeuer, N. (2024). *Directive to empower consumers for the green transition ("Empowering Consumers Directive") has been published*. Bird &Bird. https://www.twobirds.com/en/insights/2024/global/directive-to-empower-consumers-for-the-green-transition-has-been-adopted

Ellen MacArthur Foundation. (2024). *Circular economy introduction*. Ellen MacArthur Foundation. https://www.ellenmacarthurfoundation.org/topics/circular-economy-introduction/overview

Eng, N., DiRusso, C., Troy, C. L., Freeman, J. R., Liao, M. Q., & Sun, Y. (2021). 'I had no idea that greenwashing was even a thing': identifying the cognitive mechanisms of exemplars in greenwashing literacy interventions. *Environmental Education Research, 27*(11), 1599-1617.

Ernst & Young Global. (2024). *European Parliament adopts New Rules on Green claims*. Ernst & Young. https://www.ey.com/en_gl/technical/tax-alerts/european-parliament-adopts-new-rules-on-green-claims

EUR- Lex. (2024). *EU Directive 2024/825*. EU. https://eur-lex.europa.eu/eli/dir/2024/825/oj

EUR-Lex. (2005). *Directive - 2005/29 - en - EUR-lex*. EUR. https://eur-lex.europa.eu/eli/dir/2005/29/oj

European Commission. (2024). E.U. Ecolabel facts and figures. European Commission: Energy, Climate change, environment. https://environment.ec.europa.eu/topics/circular-economy/eu-ecolabel/business/ecolabel-facts-and-figures_en#:~:text=As%20of%20March%202024%2C%202,services)%20on%20the%20EU%20market
European Union. (2022). *The Consumer Rights Directive (2011/83/EU)*. EUR. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011L0083
European Union. (2022). *The Consumer Rights Directive (2011/83/EU)*. EUR. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32011L0083
European Union. (2024). *EUR-Lex*. European Union. https://eur-lex.europa.eu/eli/dir/2024/825/oj
Federal Trade Commission. (2012). *Environmentally Friendly Products: FTC's Green Guides*. https://www.ftc.gov/news-events/topics/truth-advertising/green-guides
Fernandes, J., Segev, S., & Leopold, J. K. (2020). When consumers learn to spot deception in advertising: testing a literacy intervention to combat greenwashing. *International Journal of Advertising, 39*(7), 1115-1149.
Fletcher, K. (2013). *Sustainable Fashion and Textiles: Design Journeys*. Routledge.
Franzen, A., & Vogl, D. (2013). Two decades of measuring environmental attitudes: A
Freitag, D. (2014). *Natural Fibres*. https://www.freitag.ch/en/natural-fibers
Gigounas, G., McCaffrey, A., Sacks, A., & Fogel, S. (2023). *FTC to revise its guidance on environmental marketing as it seeks public comment on the Green Guides*. DLA Piper https://www.dlapiper.com/en-ca/insights/publications/2023/01/ftc-to-revise-its-guidance-on-environmental-marketing-as-it-seeks-public-comment-on-the-green-guides
Gordon, J. F., & Hill, C. (2015). Sustainable fashion: past, present and future. Bloomsbury Publishing.
Government of Canada. (2021a). *Environmental claims and greenwashing*. Competition Bureau. https://competition-bureau.canada.ca/how-we-foster-competition/education-and-outreach/environmental-claims-and-greenwashing
Government of Canada. (2021b). *Guide to the Textile Labelling and Advertising Regulations*. Competitition Bureau Canda. https://competition-bureau.canada.ca/guide-textile-labelling-and-advertising-regulations
Government of Canada. (2022 c). *Precious metals labelling requirements*. Competition Bureau.https://competition-bureau.canada.ca/labelling/precious-metals/precious-metals-marking
Government of Canada. (2022a). *Guide to the Textile Labelling and Advertising Regulations*. Competition Bureau. https://competition-bureau.canada.ca/guide-textile-labelling-and-advertising-regulations#Objectives
Government of Canada. (2022b). Textile labelling requirements. Competition Bureau. https://competition-bureau.canada.ca/how-we-foster-competition/education-and-outreach/environmental-claims-and-greenwashing
Government United Kingdom. (2023). Get your green claims right. https://greenclaims.campaign.gov.uk/
Guirguis, A., Mandla, J., Gray, J., Farinelli, T., & Yim, J. (2023). The ACCC's Eight Commandments for Environmental and Sustainability Claims and Avoiding Greenwashing and Breaches of the Australian Consumer Law K&L Gates. https://www.klgates.com/The-ACCCs-Eight-Commandments-for-Environmental-and-Sustainability-Claims-and-Avoiding-Greenwashing-and-Breaches-of-the-Australian-Consumer-Law-7-20-2023
Gwilt, A., & Rissanen, T. (2011). *Shaping sustainable fashion: changing the way we make and use clothes*. Routledge.
H2Compliance. (2024). *Demystifying Green Marketing: FTC Green Guides and the EU Green Claims Directive*. Landbell H2 Compliance. https://www.h2compliance.com/2024/04/19/demystifying-green-marketing-ftc-green-guides-and-the-eu-green-claims-directive/#:~:text=The%20FTC%20Green%20Guides%20were,was%20last%20updated%20in%202012.
Henninger, C. E., Alevizou, P., & Oates, C. J. (2016, May). *What is sustainable fashion? | Request PDF*. Research Gate. https://www.researchgate.net/publication/303546323_What_is_sustainable_fashion
Heywood, D. (2024). *European Commission finalises key Green Deal legislation with more to come*. Taylor Wessing. https://www.taylorwessing.com/de/insights-and-events/insights/2024/07/radar-european-commission-finalises-key-green-deal-legislation-with-more-to-come
Hill, M. (2024). *What is circular fashion?*. Good On You. https://goodonyou.eco/what-is-circular-fashion/
Hur, E., & Cassidy, T. (2019, January). Perceptions and attitudes towards sustainable fashion design: Challenges and opportunities for implementing sustainability in fashion.
Research Gate. https://www.researchgate.net/publication/330651227_Perceptions_and_attitudes_towards_sustainable_fashion_design_Challenges_and_opportunities_for_implementing_sustainability_in_fashion

Igini, M. (2024). The Truth About Online Shopping and Its Environmental Impact. https://earth.org/online-shopping-and-its-environmental-impact/

Jousseaume, M. (2022, January 18). *The French Climate and Resilience Law*. Centre de Politique Européene. https://www.cep.eu/fileadmin/user_upload/cep.eu/Studien/cepInput_Franzoesisches_Klima-_und_Resilienzgesetz/cepInput_The_French_Climate_and_Resilience_Law.pdf

Kirts, L. (2023). *The Guppyfriend washing bag can protect clothes and help reduce pollution*. CNN. https://www.cnn.com/cnn-underscored/reviews/guppyfriend-washing-bag

Kruger, J., & Dunning, D. (1999). Unskilled and unaware of it: how difficulties in recognizing one's own incompetence lead to inflated self-assessments. *Journal of personality and social psychology, 77*(6), 1121.

Leire, C., & Thiddell, Å. (2005, February 5). *Product-related environmental information to guide consumer purchases*. Journal of Cleaner Production. https://www.sciencedirect.com/science/article/pii/S0959652604002586

Lululemon Canada. (2024). Product sustainability: lululemon Canada. lululemon Canada. https://shop.lululemon.com/en-ca/story/product-sustainability

Lundberg, P., Vainio, A., Viholainen , N., & Koorsunova, A. (2024, July 24). *Consumers and self-repair: What do they repair, what skills do they have and what are they willing to learn?*. Resources, Conservation and Recycling. https://www.sciencedirect.com/science/article/pii/S0921344924002416

Matteis, S., & Agro, C. (2018, January 19). *What really happens to old clothes dropped in those in-store recycling bins | CBC News*. CBCnews. https://www.cbc.ca/news/business/clothes-recycling-marketplace-1.4493490#:~:text=Clothes%20from%20Canada%20account%20for%20huge%20waste%20%7C%20CBC%20Marketplace&text=Most%20of%20the%20donations%20it,and%20Central%20and%20South%20America

McGowan, J. (2024). Will Impact U.S. Companies' Climate Marketing. *Forbes Newsletter*. https://www.forbes.com/sites/jonmcgowan/2024/06/21/canadas-new-greenwashing-law-will-impact-us-companies-climate-marketing/

McIlvride, D. & Williams, R. (Directors). (2016). River Blue [Film]. Paddle Productions.

McNaughton, M., Quesnel, A. K., & Tarrabain, N. (2024). *Bill C-59 Enacted: New Laws Targeting Greenwashing*. BD&P Law Firm. https://www.bdplaw.com/insights/bill-c-59-enacted-new-laws-targeting-greenwashing/

Montgomery, A. W., & Robertson, J. L. (2022). Why Firms Hide Their Light: Brownwash, Silence, and Bifurcated Stakeholder Communication. Academy of Management Proceedings,

Oyarzabal, R., Falco, L., & Molyneux, C. G. (2023). Upcoming EU Rules on Green Claims. *Inside Energy & Environment*. https://www.lexology.com/library/detail.aspx?g=d6fa9e6c-8715-4fcd-8e35-49c14f65b5a2

Parguel, B., Benoit-Moreau, F., & Russell, C. A. (2015). Can evoking nature in advertising mislead consumers? The power of 'executional greenwashing'. *International Journal of Advertising, 34*(1), 107-134.

Pieters, L., Cook, J., Upadhyaya, J., Handrinos, N., & Fenech, C. (2023). *2023 Consumer products industry outlook*. Deloitte.

Pookulangara, S., & Shephard, A. (2013). Slow fashion movement: Understanding consumer perceptions—An exploratory study. *Journal of Retailing and Consumer Services, 20*(2), 200-206.

Ragonnaud, G. (2024). *'Green claims' directive: Protecting consumers from greenwashing* (Briefing, EU Legislation in Progress, Issue. European Union. https://www.europarl.europa.eu/RegData/etudes/BRIE/2023/753958/EPRS_BRI(2023)753958_EN.pdf

Rinaldi, F. R. (2019). *Fashion industry 2030: Reshaping the future through sustainability and responsible innovation*. EGEA spa.

Riordan, E. O. (2024). *All You Need to Know About the EU's New Greenwashing Directive*. Earth Org. https://earth.org/all-you-need-to-know-about-the-eus-new-greenwashing-directive/

Robinson, M. (2023). Global News. *Fashion's Greenwashing Problem: How Canadian shoppers might be misled by eco claims*.

Rossi, D., Rothschild, D. A., Kloes, C., Lewis, R., & Hennings, J. (2024). *False advertising and greenwashing: Bill C-59 changes to Competition Act*. Borden Ladner Gervais Law Firm. https://www.blg.com/en/insights/2024/07/false-advertising-and-greenwashing-bill-c-59-changes-to-competition-act

Sailer, A., Wilfing, H., & Straus, E. (2022). Greenwashing and bluewashing in black Friday-related sustainable fashion marketing on Instagram. *Sustainability, 14*(3), 1494.

Saleh, K. (2024). E-commerce product return rate – statistics and trends *Invesp*. https://www.invespcro.com/blog/ecommerce-product-return-rate-statistics/

Scanlan, S. J. (2017). Framing fracking: scale-shifting and greenwashing risk in the oil and gas industry. *Local Environment, 22*(11), 1311-1337.

Somers, S. (2020). Our clothes shed microfibres – here's what we can do... Fashion Revolution. www.fashionrevolution.org/our-clothes-shed-microfibres-heres-what-we-can-do/#:~:text=Microfibres%20are%20a%20type%20of,goes%20to%20sewage%20treatment%20facilities

Stahel, W. R. (2016). Circular economy: a new relationship with our goods and materials would save resources and energy and create local jobs. Nature, 531, 435-439.

Stand.earth. (2024). *Lululemon's coal pollution*. https://stand.earth/lulucoal/

Statistics Canada. (2021a). *Canadian Income Survey, 2021*. https://www150.statcan.gc.ca/n1/daily-quotidien/230502/dq230502a-eng.htm

Statistics Canada. (2021b). *Census Profile, 2021 Census of Population*. https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/prof/details/page.cfm?Lang=E&DGUIDList=2021A000011124&GENDERList=1&STATISTICList=1&HEADERList=0&SearchText=Canada

Statistics Canada. (2021c). *Income Explorer, 2021 Census*. https://www12.statcan.gc.ca/census-recensement/2021/dp-pd/dv-vd/income-revenu/index-en.html

Statistics Canada. (2022a). *First Nations people, Métis and Inuit in Canada*. https://www150.statcan.gc.ca/n1/pub/11-627-m/11-627-m2022057-eng.htm

Statistics Canada. (2022b). *In the midst of high job vacancies and historically low unemployment, Canada faces record retirements from an aging labour force: number of seniors aged 65 and older grows six times faster than children 0-14*. https://www150.statcan.gc.ca/n1/daily-quotidien/220427/dq220427a-eng.htm#archived

Statistics Canada. (2023a). *Sex at birth and gender – 2021 Census promotional material*. https://www.statcan.gc.ca/en/census/census-engagement/community-supporter/sex-birth-gender

Statistics Canada. (2023b). *Statistics Canada. Table 14-10-0327-03 Proportion of workers in full-time and part-time jobs by sex, annual*. https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1410032703

Statistics Canada. (2024a). *The Canadian Francophonie by the numbers*. tps://www.canada.ca/en/canadian-heritage/services/official-languages-bilingualism/publications/facts-canadian-francophonie.html

Statistics Canada. (2024b). *Table 17-10-0005-01 Population estimates on July 1, by age and gender*. https://doi.org/10.25318/1710000501-eng

TerraChoice. (2009). *The Seven Sins of Greenwashing, Environmental Claims in Consumer Markets* https://people.chem.ucsb.edu/feldwinn/darby/greenworks/Readings/7_Sins_of_Greenwashing.pdf

Textile Exchange. (2021). The RCS and GRS are designed to boost the use of recycled materials. https://textileexchange.org/recycled-claim-global-recycled-standard/

Textile Exchange. (2024). Polyester is the most widely used fiber worldwide. https://textileexchange.org/polyester/

The Organic Trade Association. *Global Organic Textile Standard (GOTS)*. https://ota.com/advocacy/organic-standards/fiber-and-textiles/global-organic-textile-standard-gots#:~:text=GOTS%20is%20recognized%20as%20the,with%20social%20criteria%20as%20well.

Thiboutot, M., Cuervo-Lorens, R., Gordner, T., & Loney, J. (2024). *Greenwashing and Canada's Increased Regulation of Environmental Claims: The Latest Amendments to the Competition Act*. Mcmillan. https://mcmillan.ca/insights/greenwashing-and-canadas-increased-regulation-of-environmental-claims-the-latest-amendments-to-the-competition-act/

Trottier, S. l. (2024). *From greenwashing to green trust: How Bill C-59 strengthens regulations and protects Canadians* Canada Climate Law Initiative. https://ccli.ubc.ca/bill-c-59-anti-greenwashing/

United Nations. (2024). *Greenwashing – the deceptive tactics behind environmental claims*. United Actions. https://www.un.org/en/climatechange/science/climate-issues/greenwashing

United Nations. (n.d.). *Sustainable Development Goals*. https://sdgs.un.org/goals

Van Vooren, B., Oyarzabal, R., García Molyneux, C., Finan, S., Mertenskötter, P., & Edmonds-Camara , H. (2024, January 31). *EU adopts new rules on Greenwashing and Social Impact claims*. Inside EU Life Sciences. https://www.insideeulifesciences.com/2024/01/31/eu-adopts-new-rules-on-greenwashing-and-social-impact-claims/

Watson, B. (2016). The troubling evolution of corporate greenwashing. https://www.theguardian.com/sustainable-business/2016/aug/20/greenwashing-environmentalism-lies-companies

Weber, S. (2015). *How Consumers Manage Textile Waste* University of Waterloo]. Waterloo, ON.

Weber, S. (2021). *Transitioning the fashion industry towards sustainability* University of Waterloo]. Waterloo, ON.

Weber, S., Shawn, S., Caren Chan, C., Maldonado Quiroz, I., Profiti, V., & Gonzalez Varon, N. (2024). *Greenwashing in the fashion industry* [Art Installation]. [A mannequin dressed in a beautiful green dress in front of a washing machine releasing greenwashed garments]. Seneca Polytechnic, Toronto.

Weideli, D. (2013). *Environmental Analysis of US Online Shopping* Center for Transportation & Logistics]. Cambridge MA, USA. https://ctl.mit.edu/pub/thesis/environmental-analysis-us-online-shopping

Weintraub, M., Sutton, J., Iida, J., & MacLeod, J. (2024). *Creating value from sustainable products*. Deloitte. https://www2.deloitte.com/content/dam/Deloitte/ca/Documents/consumer-industrial-products/ca-en-consumer-creating-value-from-sustainable-products-aoda.pdf?icid=en-hero

Wicker, A., Schmall, E., Raj, S., & Paton, E. (2022, February 14). *That organic cotton T-shirt may not be as organic as you think*. The New York Times. https://www.nytimes.com/2022/02/13/world/asia/organic-cotton-fraud-india.html

Wilson, A. (2022). *Perfectly Circular: Candiani's Compostable Jeans*. https://www.textileworld.com/textile-world/features/2022/12/perfectly-circular-candianis-compostable-jeans/

APPENDICES:

APPENDIX A: EXPERT INTERVIEW DISCUSSION GUIDE

EXPERT INTERVIEWS DISCUSSION GUIDE

Introduction

- FTA recently conducted a survey with 2000 Canadians about the attitudes and behaviour toward sustainable and circular fashion, as well as how they perceive and feel about greenwashing in the apparel industry. We are speaking with you as you are an expert in greenwashing/fashion and we wanted your personal perspective and opinion on the topic.
- We are recording the session for transcription purposes only. Your comments can be anonymous OR we would love to have permission to quote you in the final report, some of the articles or other documents but would ask for permission first

General Perceptions

- I'd like to start by understanding your perceptions of and perspectives on greenwashing in the apparel industry (both globally and in Canada?)
- Think of this as a verbal Rorschach Test: when you think of greenwashing in fashion, what three words come to mind?
- How serious a problem is greenwashing in fashion, in your view? Why do you say that?
    - Do you think it has gotten better or worse (or neither) in the last few years? Explain
    - How does it compare to greenwashing in other industries?
- Who, in your view, are the big culprits?
    - Can be interpreted as brand, company, type of retail, etc
    - What, if anything, is the cost of greenwashing?
- How do you think greenwashing in the clothing industry might be reduced?
    - How difficult is this? Why?
    - What strategies are you aware of? What has been successful? Examples
    - Whose job is it, in your view, to counter greenwashing? Who should be accountable?
    - Are there any brands (Canadian…American…International) that are doing a good job in this regard; that is, being truthful and realistic with consumers about their sustainability practices?

The Canadian Consumer and Apparel Greenwashing

- How **sensitive** do you think Canadians are to greenwashing in general? To greenwashing in the apparel industry? Why do you say that?
    - Have people ever spoken to you about greenwashing? If so, who / in what context?
    - **Who** do you think is most sensitive to greenwashing in apparel? Why? To what degree do you think Canadians **trust** apparel brands and the claims that are being made about their products? Why do you say that?
- How easy or difficult do you think it is for Canadians to recognize greenwashing? Why do you say that?
    - If difficult – Why? What makes it difficult for them to recognize greenwashing in apparel?
    - How do they recognize it? What triggers "greenwashing" to consumers?
    - How informed do you think Canadians are about the way clothes are made? About their sustainability?
    - Do you think the level of understanding about clothing and clothing sustainability plays a role in their ability to recognize greenwashing?
    - Do you think they're being misled? If so, in what way? By whom in particular?
    - How do you think Canadians react when they encounter greenwashing in apparel or in communications about apparel
    - What brands (retailers, clothing brands, companies, etc.) do you think are doing a good job communicating (transparency) with consumers? What brands are engaging in greenwashing?
    - And what clothing brands do you think consumers trust? What brands do consumers in Canada associate with greenwashing?

"Solutions"

Where should the impetus to reduce or eliminate greenwashing in apparel come from?

Who should lead it? What should they do? Where else should initiatives come from?

IF NOT MENTIONED SPONTANEOUSLY, ASK RE:

        - Government / government agencies
        - ENGOs
        - Brands / apparel companies
        - Retailers
        - The media
        - “Celebrities / influencers” / bloggers
        - Business watchdogs (Better Biz Bureau, etc.)
- How might brands be motivated to avoid greenwashing?
- Do you think it’s possible to make Canadians more involved in issues related to greenwashing? Why/why not?
    - If so, what will it take?
    - How good a job is the media doing to bring greenwashing in fashion to consumers’ attention? Why do you say that? What should they do differently?
- How important is consumer education?
    - What are the most effective ways to **educate** the public?
        - What strategies have been successful, both within apparel and in other industries?
    - Whose **responsibility** is it? Brands? Manufacturers? Retailers? Bloggers?
        - Are there any brands, companies, agencies, NGOs (etc.) that have done a good job educating the public about greenwashing in apparel? If so, who?
    - How do/should brands (etc.) deal with the complexities of apparel sustainability (use virgin polyester example from report, p. 11)

<u>Wrap-Up</u>

- To what degree do you think Canadians currently trust the brands of apparel available to them? Why/why not?
- What erodes trust?
- How can trust be built and maintained?
- And what specifically should governments do to lessen the impact of greenwashing?
- Regulations? Standards? Guidelines?
- How can standards and regulations be enforced in the industry
- What advice would you give to an apparel brand, manufacturer or retailer that is trying to avoid greenwashing?
- Before we end, what is the Number One message you would have for consumers in Canada about greenwashing in apparel?
- And what is the Number One message you would have for brands and others in the industry about greenwashing in the industry?
- Do you have any other comments?

APPENDIX B: SURVEY QUESTIONS

PROGRAMMING NOTES – STATIC ORDER UNLESS OTHERWISE INDICATED

S1 - Ask All
Radio
Do you identify as…
- Male
- Female
- Non-binary
- I prefer not to answer

S2 - Ask All
Radio
To which of the following age groups do you belong?
TERMINATE
- 15-19
- 20-24
- 25-34
- 35-44
- 45-54
- 55-64
- 65+
- I prefer not to answer this question

QUOTAS:
Ages 15-19 – minimum 90, maximum 100
Ages 20-34 - at least 550
Ages 35-54 – at least 600
Ages 55+ - maximum 650

S3 - Ask All
Radio
How many people currently live in your household?
- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- more than 9

S4a - Ask All
Do you identify your heritage as:
1. Indigenous (First Nations/Métis/Inuit)
2. Caucasian
3. Visible minority
4. None of the above
5. Other (write in) ANCHOR

QUOTAS:
At least 100 are S4b=1 (Indigenous (1st Nations, Inuit or Métis)

S4b – As if S4a=1
Checkbox
You mentioned that you are Indigenous. Are you…
- First Nations
- Métis
- Inuit
- Other (write in) **ANCHOR**
- Don't know / Not sure
- I prefer not to answer

TRACK TO ENSURE APPROPRIATE MIX OF FIRST NATION, MÉTIS, INUIT
Note: roughly 50-60% First Nations / 30-40% Métis / 8-10% Inuit

S4c – Ask If S4a=1 (Indigenous)
Checkbox
And do you live…
- Primarily on-reserve
- Primarily off-reserve
- Both on-reserve and off-reserve
- None of the above
- Other (write in) **ANCHOR**

TRACK TO ENSURE MIX OF THOSE LIVING ON RESERVE (c 25-40%) AND OFF RESERVE

S5 – Ask All
Radio
Would you describe the area of your primary residence as:

- A large urban centre
- A small city or town
- Suburban
- Rural
- Remote
- Other (write in) ANCHOR

TRACK THAT 1-4 ARE REPRESENTATIVE OF THE REGION OF THE COUNTRY

S6 – Ask All
RADIO
Which of the following most closely describes your current work status? Are you… (LOCALIZE IF NEEDED)

- Working full-time
- Working part-time
- Homemaker
- Student
- Retired
- Unemployed, looking for work
- Unemployed, not looking for work
- Other (write in) ANCHOR
- I prefer not to answer

TRACK THAT 1-4 ARE REPRESENTATIVE OF THE REGION OF THE COUNTRY

S6a – Ask If S2=3, 4, 5, 6, 7 or 8
Radio
And for classification purposes only, what is your annual household income before taxes?

- Less than $ 10,000 per year TRACK
- Between $ 10,000 and $ 34,999 per year
- Between $ 35,000 and $ 49,999 per year
- Between $ 50,000 and $74,999
- Between $ 75,000 and $ 99,999
- Between $100,000 and $ 149,999
- Between $ 150,000 and $ 199,999
- Between $ 200,000 and $ 249,999
- $ 250,000 or more
- Don’t know
- I prefer not to answer

INFONODE
We have a few questions about some of the products you might purchase.

S7 - Ask All
Checkboxes
Do you personally both shop and decide what to purchase when shopping for the following types of products? CHECK ALL THAT APPLY

- Food
- Personal care products (e.g., shampoo, deodorant, toothpaste or skin lotion)
- Home care products (e.g., laundry detergent or household cleaners)
- Clothes **MUST SAY**
- Automobiles

S7a.i – Ask All
Radio
On average, how often do you purchase any type of clothing for yourself? Note that this includes items such as new and secondhand clothing and can include smaller items, like underwear and socks.

1. At least once a week
2. About twice a month
3. At least once every month
4. About four to six times per year
5. About once or twice a year

6. About once every two years
7. Less often than once every two years TERMINATE; TRACK NUMBERS LOST

Q1 – Ask All
Grid/Randomize
Do you purchase:

- New clothing
- Used (secondhand) clothing
- Clothing that I make for myself or that others make by hand for me

COLUMNS
a) Always
b) Often
c) Sometimes
d) Rarely
e) Never

TRACK THOSE WHO SAY #3 OR 4 TO DETERMINE IF WE NEED QUOTAS

Q1a – Ask All
Checkbox– Randomize
Where do you purchase clothing? Check all that apply
1. At a department store
2. At a neighbourhood boutique
3. At a "fast fashion" retailer
4. At a discount store, discount mall, outlet mall or wholesale or club store
5. At a luxury retailer
6. At a sporting goods store or outdoor retailer
7. At a retailer that specializes in baby or children's clothes
8. At a store that specializes in 'eco-friendly' and sustainable clothing
9. At a vintage, second hand or consignment store, apps or platforms
10. At an outdoor market, flea market or craft fair
11. From a friend or family member or at a swap or clothes exchange
12. Other _____ **ANCHOR; OE TEXT BOX**

Q2 – Ask All
Randomize / Grid
In general, how important are each of the following factors when you buy clothing?

- Style
- Fit
- Comfort
- Price
- Brand name I like
- Made in Canada
- The type of fabric
- The environmental impact of the garment
- The fair treatment of the people who made the garment.

COLUMNS
a) Very important
b) Important
c) Not very important
d) Not at all important

Q2a – Ask All
Randomize/Checklist
Which of the following influences the choice of clothes you buy? Please check all that apply

- The merchandise I see when I'm shopping at a physical store or online
- Sales associates and other store employees
- The fashion press – news articles, magazines, television
- "Street fashion"; that is, people I don't know
- Fashion designers
- Friends, family, acquaintances
- Bloggers, vloggers, influencers
- Celebrities, role models, artists, musicians or sports figures

Q3a – Ask All
Grid/ Randomize
Do you do any of the following with clothes you no longer need or want?

- Donate them to a charity store, bin, or call for pick up
- Bring them to a new clothing retailer that has a bin for used clothing
- Bring them to a used clothing retailer
- Give them to a friend or family member
- "Repurpose them" to create something different
- Throw them into the garbage
- Use them as rags for cleaning

- Sell them
- Swap or exchange them with other people

COLUMNS:
a) Always
b) Often
c) Sometimes
d) Rarely
e) Never

Q3b – Ask All
Randomize / Checkbox
What do you think happens to donated clothing that doesn't sell locally? Please check all that apply
- They are sold overseas
- They are sent to landfill in Canada
- They are sent to landfill located in remote countries, often in developing nations
- They are distributed to community shelters in Canada
- They are recycled into new textile products
- I don't know
- Other _____ (write in) **ANCHOR/ OE TEXT BOX**

INFONODE
We're going to change directions now and talk about some of the issues that might concern people today and about "sustainable living", which means understanding how our lifestyle choices impact the environment, people and animals, and finding ways for everyone to live better and lighter.

Q4a – Ask All
Radio – Check One
Which of the following best describes you:
1. I'm doing everything I can to live as sustainably as possible
2. I'm trying to make more sustainable choices
3. I'd like to live more sustainably but it's difficult to know how or where to start
4. I'd like to live more sustainably but it's expensive
5. I'm not interested in sustainable living
6. None of the above
7. Other _____

Q4b – Ask All
Grid/Randomize
Read the following statements and indicate if you strongly agree, agree, neither agree nor disagree, disagree or strongly disagree:
- I would be willing to accept cuts in my standards of living, if it helped to protect the environment
- I would be willing to pay higher prices for goods and services, if it helped to protect the environment
- I would be willing to support higher taxes, if it helped to protect the environment
- I would be willing to sacrifice some personal comforts in order to save energy
- I feel my own personal behaviour can bring about positive environmental change

COLUMNS:
a) strongly agree
b) agree
c) neither agree/disagree
d) disagree
e) strongly disagree

Q4c – Ask All
Radio
Which of the following statements best describes how you feel about environmental issues?
a) I am extremely concerned
b) I am somewhat concerned
c) I have no opinion
d) I am not very concerned
e) I am not at all concerned

Q5 – Ask All
Radio – Choose One
Have you made an effort to reduce the impact of the clothes you buy and wear?
- I'm doing everything I can to reduce the impact
- I'm trying to reduce the impact
- I'd like to reduce but it's difficult to know how or where to start
- I've thought about reducing the impact but haven't yet
- I haven't put much effort into reducing the impact
- I'm not likely to try to reduce the impact
- I'm not interested in reducing the impact
- I have never even thought about this

Q5b –Ask All
Grid/Randomize
Have you done any of the following actions to reduce the impact of the clothing you own?

- Repaired your own clothes
- Had someone else (e.g., a cleaner or tailor) repair your clothes
- Washed clothes less often
- Washed clothes in cold water
- Hung your clothes to dry
- Educated yourself about how to be more sustainable in your apparel choices
- Worn clothes until they practically 'fall apart'
- Donated used clothing
- Shopped more online
- Used a laundry bag or another kind of filter to prevent micro-plastic pollution
- Read and then followed garment care instructions on clothing tags

COLUMNS:
a) Very frequently
b) Frequently
c) Occasionally
d) Rarely
e) Never

Q6 – Ask All
Grid - Radio
Have you ever seen clothing described as "eco-friendly"?
Have you ever seen clothing described as "sustainable?"

COLUMNS:
a) Yes
b) No

Q6a – Ask If Q6=1
Grid – Radio
Have you ever purchased clothing that has been marketed as "eco-friendly" or "sustainable"?

COLUMNS:
a) Yes
b) No

Q6b – Ask If Q6a=1
Grid - Randomize
Why did you purchase clothing described as "eco-friendly" or "sustainable?"

- I care about the environment and want to reduce my impact
- I am concerned that the chemicals used to make clothing might have an impact on my health or the health of my children
- I can only wear natural and organic fabrics
- I want to buy clothing that was made by workers who were paid a living wage and who worked in safe conditions
- I believe it's the right thing to do
- The garment just happened to be eco-friendly" or "sustainable", but I purchased it for another reason

COLUMNS:
a) Strongly agree
b) Agree
c) Neither agree/disagree
d) Disagree
e) Strongly disagree

INFONODE

For the rest of the survey, we will use the term "SUSTAINABLE CLOTHING" which is clothing that has been made:

1. in a way that does not harm the environment
2. in a way that does not harm or disadvantage those who make the clothing, and
3. without toxic substances that could harm those making or wearing the clothing.

Q6d – Ask If Q6=1
Checklist - Randomize
What words would you use to describe your impression of sustainable clothing? Please check all that apply.

- Affordable
- Comfortable
- Durable
- Expensive
- Hard to find

- Well made
- Luxury
- Low quality
- Made with natural fibres
- Made with organic fibres
- Not for someone like me
- Somewhat affordable
- Stylish
- Unfashionable
- Uncomfortable
- Other _____

Q7 – Ask All
Radio
Are you familiar with the word "transparency" when used in a business sense?
1. Yes
2. No

INFONODE
"Transparency" means that companies are open and honest when they talk about their business practices.

Q8 – Ask All
Radio
How transparent do you think companies are when they describe their sustainability practices? Do you think they are:
1. Very transparent
2. Somewhat transparent
3. Not very transparent
4. Not at all transparent
5. I never thought about this.

Q9a – Ask All
Grid
When clothing companies make claims that their products are sustainable using terms like "organic," "recycled," "low carbon," "Fair Trade," "Made in Canada", "eco-friendly," do you believe them:

COLUMN:
a) Always
b) Most of the time
c) Sometimes
d) Rarely
e) Never

Q9b – Ask All
Grid
Do you check if the sustainability claims made by clothing companies are true:
a) All of the time
b) Most of the time
c) Some of the time
d) Rarely
e) Never

Q9c – Ask If Q9b = a, b or c
Checkbox – Randomize
Why do you check if claims made about clothes are true? Please check all that apply.
- I tend to be skeptical about these types of claims
- It makes me feel less guilty about buying clothes knowing that the brand's claims about sustainability are true
- I'm concerned about the people making the clothes; for example, I want to know whether the clothes were made in a sweatshop, using forced labour, whether those making the clothes are paid a living wage, whether they work in safe conditions etc
- I worry that the Canadian apparel industry is unregulated so companies can make whatever claims they want
- Companies say things about sustainability because they know that nowadays it's good for business and profits
- I have health conditions which require rigorous product safety
- I check automatically because I care very much how my clothes are made
- Some other reason _____ (Write in) **ANCHOR; OR TEXT BOX**

Q9d – Ask If Q9b = a, b or c
Checkbox - Randomize
How do you check if claims about the sustainability of the clothing are true?
- I check for a symbol of certification by a third-party organization to verify the claims are true
- I read the label for the materials used to make the garment
- I look for environmental rankings or scorecards of clothing brands prepared by environmental organizations
- I check websites of environmental organizations

- I check the company's social media
- I look where the item was manufactured (that is, in what country)
- I ask somebody (for example, a store associate, friend, acquaintance)
- I search social media or online news sources (e.g., blogs, reviews)
- I look for comments by an expert or influencer
- I check the brand's sustainability practices or try to find a Sustainability Report on their website

COLUMNS:
a) strongly agree
b) agree
c) neither agree/disagree
d) disagree
e) strongly disagree

Q9e – Ask If Q9b = d or e
Grid - Randomize
Why do you rarely or never check if claims about sustainability practices are true?

- I don't have to check because the government ensures that clothing sold in Canada has been manufactured without causing harm to the environment and/or to those making or wearing the products
- I trust the company
- I don't want to take the time to check
- I don't think the clothes I buy will make a difference
- It's not my responsibility
- I have more important things to worry about
- If I like a garment, I want to buy it regardless of the claims that are made
- It's not that important to me to know about these practices
- I don't have to check because there is a certification symbol that shows these claims are true

COLUMNS:
a) strongly agree
b) agree
c) neither agree/disagree
d) disagree
e) strongly disagree

Q10 – Ask All
Radio
Are you aware that there are independent organizations that certify whether sustainability claims are true.

- Yes
- No

Q10a – Ask All
Grid – Randomize Order
Do you look for any of these certification symbols that verify sustainability claims when you shop for products?

COLUMNS
a) Yes
b) No

Q10b – Ask All
Radio
Have you ever seen a certification symbol on clothing that verifies that sustainability claims are true?
1. Yes
2. No

Q10c – Ask All
Grid – Randomize Order of Visuals
Ask Q1-3 For each Visual Before Moving on to the Next
1. Have you ever seen this symbol on clothing you have purchased?
2. Do you know what it stands for specifically?

COLUMNS:
a) Yes
b) No

Visuals
Will Show French Versions in Quebec (If they Exist).
Rows (randomize):
1. Organization/Logo 1 = English B CORPR
2. Organization/Logo 2 = BLUESIGNR
3. Organization/Logo 3 = FAIRTRADER
4. Organization/Logo 4 = GOTSR = GLOBAL ORGANIC TEXTILE STANDARD
5. Organization/Logo 5 = English OEKO-TEXR - MADE IN GREEN
6. BCorp - French

Q11 – Ask All
Radio
Are you familiar with the term "greenwashing?"

- Yes
- No

INFONODE
"Greenwashing" occurs when companies try to 'appear' more sustainable than they actually are by using misleading information or making claims that are false or lacking proof. It also occurs when companies do not share negative information, sharing only the positive.

Q11a – Ask All
Radio
Is greenwashing among consumer goods companies in Canada generally….

- Very serious
- Serious
- Not serious
- Not very serious
- Not serious at all

Q11b – Ask All
Radio
How much does greenwashing bother you? Does it bother you:

1. A great deal
2. Somewhat
3. A little
4. Not very much
5. Not at all

Q11c – Ask All
Radio
How easy or difficult is it to determine if a clothing company is greenwashing? Is it:

1. Very easy
2. Easy
3. Neither easy nor difficult
4. Difficult
5. Very difficult

Q12 – Ask All
Use Visuals Provided in the Appendix - Randomize
For each of the following pictures, please indicate whether you think it is greenwashing or not greenwashing?

- Yes
- No

Q12a – Ask All
Grid - Randomize
Have you seen clothing brands advertise their products in any of the following ways?

1. They used 'buzzwords' without offering proof
2. They were vague about what "good" they actually do
3. They exaggerated their environmental practices
4. They made sweeping statements like "We want to save the planet" or "This is a more sustainable garment" without providing detail
5. They showed pictures of nature (and/or use earthy colours) to imply that they're sustainable - but didn't explain how
6. They offered endorsements by "pretend" environmental organizations, organizations that never existed or no longer exist
7. They promoted one small thing the brand was doing (for example, that they used recyclable packaging) but ignored how the product impacted the environment or people in other ways
8. They used endorsements from "green" influencers or celebrities instead of explaining what the brand was actually doing
9. They emphasized the fact that the brand's products did not contain a substance that was already banned - and therefore, not used in any consumer products

COLUMNS:
a) Very frequently
b) Frequently
c) Occasionally
d) Sometimes
e) Never

Q12d – Ask All
Grid - Randomize
Where do you think you'd be most likely to find examples of greenwashing for clothing?

1. Fast fashion
2. Luxury fashion
3. Sporting goods or outdoor clothing
4. Children's clothing
5. Stores that specialize in sustainable merchandise
6. Department stores
7. Stores that make or sell Indigenous fashion and/or merchandise
8. Small boutiques
9. Discount stores or outlet malls
10. Vintage stores
11. Canadian-owned boutiques
12. Global clothing chains
13. In an online store environment
14. On social media
15. In advertisement campaigns

COLUMNS:
a) Always
b) Often
c) Sometimes
d) Rarely
e) Never

Q12e – Ask All
Randomize - Checkbox
Who is the most trustworthy about the sustainable practices of clothing companies? Check all that apply

- 1. The manufacturer
- The retailer
- An environmental non-profit organization
- A government representative
- Someone you know who works for the company
- An industry association
- An influencer
- A blogger
- News and Fashion media (TV, newspapers or magazines
- A celebrity
- None of the above

INFONODE
Several major international studies have found that 40% - 60% of green claims are, in fact, greenwashing.

Q12f – Ask All
Radio
What would you do if you learned that your favourite clothing company was greenwashing? Please check all that apply.

1. It wouldn't matter - I would purchase their products anyway
2. Buy fewer of the products
3. Stop buying the products altogether
4. Mention it on social media
5. Report the brand to the Better Business Bureau or another business overseer
6. Contact the brand and demand an explanation
7. Contact a consumer advocacy group
8. Contact an environmental organization or watchdog
9. Contact the media
10. Contact my MP or MPP to request tighter regulation of the apparel industry in Canada
11. Complain about misrepresentation to "Advertising Standards Canada" or the Canadian Competition Bureau
12. Tell people I know to buy fewer, or even none, of the brand's products
13. None of the above

Q12g – Ask All
Checkbox - Randomize
Are you aware that the Canadian government's Competition Act [s. 74.01(1)(a)] prohibits representations to the public that promote a product or any business interest that is false or misleading…
1. Yes
2. No

INFONODE

The following is a list of facts about the clothing industry.

1. The clothing and textiles industry is responsible for approximately 20% of global industrial waste water
2. Canadians throw away about half a million tons of clothing annually.
3. Less than 1% of our unwanted clothing is recycled into new garments.
4. Many garment workers regularly work 14-18 hours a day, six days a week, in conditions that are unsafe and even hazardous.
5. 35% of the plastic that is polluting our oceans comes from the microfibers that are shed every time we wash synthetic clothes

Q13 – Ask All
Grid - Randomize
How do you react?

1. These facts shock me
2. The facts make me think differently about the clothing industry
3. These facts make me think differently about the clothes I buy and wear
4. These facts make me want to learn more about the sustainability practices of the companies I purchase from
5. These facts make me angry
6. These facts do not surprise me; I already knew many or all of these facts
7. I don't believe that these facts are true
8. These facts are horrible, but to improve the situation is not within my reach
9. These facts don't really bother me

COLUMNS:
a) Yes
b) No

Q14 – Ask All
Grid/Randomize
What should the government's role be in protecting Canadians from greenwashing by clothing companies?

1. Develop policies about sustainability practices in the clothing industry
2. Regulate the clothing industry to ensure that companies comply with sustainability directives
3. Give NGOs (non-governmental agency) the authority to pressure clothing brands to be transparent and sustainable
4. Provide guidelines about advertising and other communication about greenwashing in the industry
5. Fine agencies and other communications companies for misrepresenting
   sustainability practices
6. Appoint an organization to monitor clothing companies to ensure they are compliant with sustainability guidelines
7. Educate Canadian students at all levels about clothing production and sustainability
8. Develop a broader public education campaign to educate all Canadians about sustainability in clothing and how to spot greenwashing

COLUMNS:
a) Strongly agree
b) Somewhat agree
c) Neither agree nor disagree
d) Somewhat disagree
e) Strongly disagree

Q15 – Ask All
Grid - Randomize
How can clothing brands earn and maintain your trust to show that they act sustainably?

1. They should be transparent about the materials used in the garments: where they come from, what is in them, and so forth
2. They should provide third-party certification to ensure that all garment workers earn a living wage - enough to cover basic human needs, such as food, shelter, medicine, education, and so forth
3. They should provide third-party certification to ensure that their garments have reduced environmental impacts
4. They should be truthful when making environmental or sustainability claims
5. They should communicate their environmental initiatives in simple, easily understood language
6. They should publish a sustainability report that includes metrics, sets scientific goals and reports progress.
7. They should be transparent and show what do they with their unsold merchandise
8. They should support a social or environmental cause, for example to plant trees or build schools
9. They should not make sustainability claims on social media to get attention, because there is not enough room for more detailed information.
10. None of the above

COLUMNS:
a) strongly agree
b) agree
c) neither agree/disagree
d) disagree
e) strongly disagree

Q16 – Ask All
Checkbox – Randomize
Are you aware of any of the following environmental organizations that are devoted to improving sustainability in fashion? Check all that apply
1. David Suzuki Foundation
2. Environmental Defence
3. Fashion Revolution Canada
4. Fashion Takes Action
5. Greenpeace
6. Ocean Wise
7. Stand Earth
8. Women's Healthy Environments Network
9. World Vision
10. Some other organization(s) _____ *(write in).* **ANCHOR. OR EXCLUSIVE**

Q17 – Ask All
Randomize – Grid
What is your level of interest in fashion?
1. I seek out new fashion trends and spend a fairly high proportion of my income and time on fashion
2. Compared to my friends, I own more of the latest fashion styles
3. I read the fashion news regularly and keep my wardrobe updated with fashion trends
4. I am usually the first to know the latest fashion trends
5. My friends regard me as a good source of fashion advice
6. I like to buy new clothing early, just when the fashion trend begins

COLUMNS:
a) Agree strongly
b) Agree somewhat
c) Neither agree nor disagree
d) Disagree somewhat
e) Disagree strongly

FINAL DEMOGRAPHICS

INFONODE
Now just a few questions for classification purposes

D1 – Ask All
Checkbox – Randomize
What is your marital status?
(Localize as needed)
1. Married or living with partner
2. Single, never married
3. Separated or divorced
4. Widowed

D2 – Ask All
Checkbox – Randomize
Localize for Different Provinces
What is the highest level of education you have achieved?
1. Less than high school
2. High school graduate or equivalent
3. 2-year college degree (Associates or other technical degree)
4. 4-year university degree (Bachelor's degree)
5. Graduate School (Masters or Doctorate)
6. Post-Graduate

D3 – Ask All
Radio
Were you born in Canada or in another country?
- Yes, I was born in Canada
- No, I was born elsewhere
- I prefer not to answer this question

D4 – Ask If D3=2
Radio
How long have you lived in Canada?
- Less than 1 year
- 1-2 years
- 3-10 years
- 11-15 years
- More than 15 years
- All my life
- I prefer not to answer this question

D4 – Ask All
Checkbox – Randomize

And is your family or part of your family from any of the regions below? Please check all that apply

1. Western Europe, including Britain, Ireland and Scandinavia
2. Eastern Europe, including Baltic States and Russia
3. Middle East, including Israel
4. North America: Canada or the USA
5. Caribbean
6. Mexico, Central America and South America
7. Middle East
8. Africa
9. East Asia
10. South Asia, including Pakistan
11. Australia and Pacific Islands
12. Not sure
13. Other (write in) ANCHOR
14. I prefer not to answer

End of Survey

FASHION
TAKES
ACTION