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The Quiet Turn: Are Indian FMCG Companies Moving from Greenwashing to Greenhushing?

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Abstract

Indian law has started examining the environmental claims made by organizations with greater detail than before. The Advertising Standards Council of India (ASCI) has published environmental-claims guidelines earlier this year; and the Central Consumer Protection Authority (CCPA) published binding greenwashing guidelines in October of 2024. According to international studies, the increased scrutiny can lead companies to "greenhushing", i.e., being more cautious about communicating about their actual environmental work in order to avoid the scrutiny. This study investigates if Indian law creates an environment where companies are likely to engage in "greenhushing" and whether there is evidence of this practice in large fast moving consumer goods (FMCG) organizations.

The doctrinal analysis shows that Indian law penalises what companies say but imposes no duty to speak beyond mandatory disclosures by listed companies, so silence is legally costless. A small documentary dataset, built from ASCI reports and the public statements of five listed FMCG companies, finds no clear sign of greenhushing in their flagship plastic claims. Instead, those claims continue and increasingly rest on the statutory Extended Producer Responsibility (EPR) system. The paper argues that the real risk is not silence but claims anchored to a compliance system with known integrity problems. It proposes targeted reforms.

Keywords: greenwashing; greenhushing; FMCG; CCPA Guidelines 2024; ASCI; EPR; plastic neutrality; India

Introduction

For most of the last decade, an Indian company could call a product "eco-friendly" with little legal risk. That changed quickly. ASCI's Guidelines for Advertisements Making Environmental/Green Claims took effect on 15 February 2024. On 15 October 2024, the CCPA notified the Guidelines for

Prevention and Regulation of Greenwashing or Misleading Environmental Claims, 2024 (the "CCPA Guidelines") under the Consumer Protection Act, 2019. ASCI's own monitoring also intensified. The number of ads it examined for green claims rose from 34 in 2023-24 to 211 in 2024-25, and every one of them needed modification.

Regulators intend this pressure to make claims honest. A second, less intended effect is possible. Companies may decide that the safest environmental claim is no claim at all. The literature calls this greenhushing: a company deliberately under-communicates positive environmental actions. It is also described as strategic silence or green muting. A formal model of the choice predicts that firms go quiet when the cost of making and defending a claim exceeds its benefit, particularly when they can sell without it (Environment and Development Economics, 2025). Empirical work abroad supports the concern. A 2026 study of Chinese listed firms found that stricter environmental regulation strengthens the tendency of firms to copy their peers' silence.

Greenhushing matters because silence is not neutral. When companies stop publishing credible environmental information, consumers and investors lose the data they need to reward good performers, and honest companies lose their competitive edge.

This paper asks three questions:

1. How does Indian law regulate environmental claims by FMCG companies? Does its design, which penalises unsupported claims but does not require communication, create an incentive to stay silent?
2. Do publicly available records show selected Indian FMCG companies reducing their environmental communication after October 2024?
3. What legal changes would encourage accurate communication rather than silence?

The paper is mainly doctrinal. The empirical part is a small documentary snapshot intended to test the doctrinal argument against real behaviour, not to prove cause and effect.

Greenwashing and greenhushing

Greenwashing and greenhushing are two ways a company's communication can fall out of line with its actual environmental performance. Greenwashing means saying more than the company does: overstating, generalising or inventing environmental benefits. Greenhushing means saying less than the company does: withholding or downplaying genuine environmental progress. A simple matrix helps. Companies that perform well and communicate are "vocal green". Those that perform poorly and stay quiet are "silent brown". The two problem cases are poor performers who talk (greenwashing) and good performers who stay silent (greenhushing). A fall in claims is not, by itself, greenhushing. If a company drops claims it could never substantiate, that is correction, which is what the regulation intends. Greenhushing occurs only where communication falls while performance holds steady or improves. This distinction runs through the rest of the paper.

Two frameworks explain why companies might choose silence:

(a) Legitimacy theory: companies communicate to appear acceptable to society. When communication itself becomes a source of risk, staying quiet protects that acceptability.

(b) Signalling theory: a claim is worth making only if the benefit of the signal exceeds the cost of substantiating and defending it.

Regulation raises that cost. The question is whether it raises it enough to silence companies, and whether the law gives them any reason to keep talking.

The Indian legal framework

1. Consumer Protection Act, 2019 and the CCPA Guidelines

The Consumer Protection Act, 2019 is the statutory base. It covers green claims in three provisions:

(a) **Section 2(28)** defines a misleading advertisement. It includes an ad that falsely describes a product, is likely to mislead about its nature or quality, amounts to an unfair trade practice, or deliberately conceals important information.

(b) **Section 21** empowers the CCPA to order a misleading ad to be discontinued or modified. It may also fine a manufacturer or endorser up to ₹10 lakh, and up to ₹50 lakh for each subsequent contravention. Endorsers can be barred from endorsing for up to one year, and up to three years for repeat violations.

(c) **Section 89** separately provides for criminal prosecution before a court: up to two years' imprisonment and a ₹10 lakh fine, rising to five years and ₹50 lakh for repeat offences.

The CCPA Guidelines apply these provisions to environmental claims. They build on the CCPA's 2022 guidelines on misleading advertisements and followed a draft released for public comment on 20 February 2024. They apply to manufacturers, service providers, product sellers, advertisers, advertising agencies and endorsers. Their key features are:

- Definitions. Section 2(e) defines "environmental claim" and Section 2(f) defines "greenwashing". Greenwashing covers deceptive practices such as concealing or omitting relevant information, making vague, false or unsubstantiated claims, and emphasising positive attributes while downplaying harmful ones.
- Exclusions. Obvious puffery, generic colour schemes, and company mission statements that are not specific to a product or service fall outside the definition.
- Prohibition and substantiation. Section 4 prohibits greenwashing. Section 5 requires substantiation and adequate disclosure.
- Generic terms. Terms such as "eco-friendly", "green" and "sustainable" cannot be used without adequate substantiation and qualifiers.

- Specific claims. Claims such as "compostable", "recyclable", "plastic-free", "plastic-positive", "climate-positive" and "net-zero" must be supported by credible certification, reliable scientific evidence, internal verifiable evidence, or certificates from statutory or independent third-party verification.
- Future-looking claims. Aspirational claims are allowed only where clear and actionable plans exist.

The CCPA said at launch that the guidelines are not meant to stop companies from talking about genuine environmental work. They are meant to ensure that such claims are backed by evidence.

2. ASCI's self-regulatory code

ASCI is a voluntary self-regulatory body. Its code draws legal force from the Advertising Code under the Cable Television Networks (Regulation) Act. Its green-claims guidelines, issued on 18 January 2024 and effective from 15 February 2024, require the following:

- absolute claims such as "eco-friendly" must be backed by robust data or credible accreditation
- such claims cannot be diluted by disclaimers, QR codes or website links
- general claims must account for the product's full life cycle

ASCI also works with the CCPA. From March 2024, the CCPA asked ASCI to forward code-violating ads that may also breach consumer law. In practice, ASCI is India's most active monitor of green advertising, and statutory enforcement leans on its referrals.

3. SEBI's BRSR

SEBI's Business Responsibility and Sustainability Report (BRSR) has been mandatory for the top 1,000 listed companies since FY2022-23. BRSR Core, introduced in 2023, identifies key indicators for verifiable disclosure. BRSR is the only regime that *requires* environmental communication, and it covers only these companies. It is directed at investors, not consumers, and it does not govern what a company says on a pack or in an advertisement.

4. Plastic Waste Management Rules and EPR

Under the Plastic Waste Management Rules, 2016 and the EPR Guidelines of 16 February 2022, producers, importers and brand owners must register on a central portal. They must meet targets for collection, recycling, end-of-life processing and use of recycled content. Targets are met by acquiring certificates generated by registered plastic waste processors.

The system's integrity has been questioned. In 2023, CPCB inspections in Gujarat, Maharashtra and Karnataka found that four recyclers had issued fake EPR certificates covering about 6.93 lakh tonnes of claimed recycling. CPCB imposed ₹355 crore in fines. The National Green Tribunal took suo motu notice in July 2024. The Centre for Science and Environment has argued that the certificate market lets brand owners meet targets without actually collecting waste.

This matters for consumer law. When an FMCG company calls itself "plastic neutral" or "plastic positive", the evidence it relies on is usually its EPR certificates.

Does the law make silence the safer option?

Read together, the four regimes create four incentives relevant to greenhushing.

First, the law regulates speech, not silence. Every consumer-facing rule above regulates what a company says. None requires it to say anything. Outside the BRSR, which is investor-facing and limited to listed companies, an FMCG company has no legal duty to communicate environmental information to consumers. A company that stops making green claims faces no consumer-law risk at all. In the language of Section 2, silence carries a cost of zero, while speech now carries a cost of substantiation plus the risk of a ₹10–50 lakh penalty and reputational damage.

Second, the concealment limb does not reach greenhushing. The CCPA definition treats concealment and omission as greenwashing, and Section 2(28)(iv) of the Act covers deliberate concealment of important information. But these provisions target hiding *harmful* information to make a product look greener. They do not reach a company that stays quiet about *good* performance. Greenhushing is therefore lawful. Only *selective* silence, such as praising recyclable packaging while hiding a harmful ingredient, is caught.

Third, the mission-statement exclusion rewards vagueness at the corporate level. Non-product-specific mission statements fall outside the definition of an environmental claim. So a company can retreat from specific, checkable product claims to general corporate language about "sustainability" without legal exposure. This is a form of greenhushing too: the company keeps its green image while removing the specific details that consumers could test.

Fourth, statutory certificates offer a "safe" claim. The CCPA Guidelines accept certificates from statutory verification as substantiation for specific claims, including "plastic-positive". EPR certificates are statutory. A company that holds enough EPR certificates therefore has a ready defence for a "plastic neutral" or "plastic positive" claim. Instead of going silent, companies have an incentive to anchor their claims to the EPR system. The consumer-law standard then inherits the EPR system's weaknesses.

On this analysis, the law's design points in two directions. It makes silence costless for uncertain or unsubstantiated claims. It also makes claims anchored to a statutory system relatively safe. The prediction is not blanket silence but a narrowing of communication towards regulator-anchored claims. The empirical snapshot tests this.

Empirical snapshot

1. Method

Two small datasets were built entirely from public sources. Each data point is recorded with its source in Appendix A.

Dataset A: ASCI green-claims data. Figures on environmental-claim ads were taken from ASCI's half-yearly and annual complaints reports for FY2023-24 to FY2025-26.

Dataset B: company plastic claims. Five large listed FMCG companies were selected: Hindustan Unilever (HUL), ITC, Nestlé India, Dabur and Marico. Selection criteria were market prominence and significant plastic packaging use. Plastic was chosen because it is the environmental issue FMCG companies communicate about most, and because it is where the CCPA Guidelines and the EPR system meet.

For each company, the headline plastic claim was recorded in two periods:

- **Pre-guidelines:** FY2023-24 or earlier.
- **Post-guidelines:** after 15 October 2024.

Four items were coded for each company:

1. the label used ("neutral", "positive", descriptive, or none)
2. whether the claim continued after October 2024
3. the stated basis for the claim
4. any quantity reported

Sources were annual reports, company websites and company press releases, as reported. Where a pre-guidelines primary source could not be located, the cell is marked "not verified" rather than filled in.

2. Findings from Dataset A (ASCI)

Table 1: ASCI scrutiny of green-claim advertisements

Period	Ads examined for green claims	Required modification	Not contested	Escalated to government
FY2023-24	34	n/r	n/r	n/r
Apr–Sep 2024 (H1 FY2024-25)	100	100%	47%	28%
Oct 2024–Mar	111	n/r	n/r	n/r

Period	Ads examined for green claims	Required modification	Not contested	Escalated to government
2025 (derived)				
FY2024-25 (full year)	211	100%	45%	14%
FY2025-26	Not separately reported	n/r	n/r	n/r

n/r = not reported. The H2 figure is derived (211 − 100).

What changed. Scrutiny rose sharply after the self-regulatory and statutory guidelines. ASCI attributes the rise to its own proactive monitoring, so the figures measure enforcement effort, not how common greenwashing is.

Where the problems were. In FY2024-25, home care, especially cleaning products, accounted for 98 of the 211 ads. Fashion and lifestyle accounted for 34 and personal care for 19. The typical problem was words like "eco-friendly", "sustainable", "biodegradable" and "plastic-free" used without proof.

The data gap. ASCI's FY2025-26 half-yearly and annual reports do not break out green claims as a separate category. So the key post-guidelines year cannot be compared, and ASCI's silence on the point cannot be read as a fall in green advertising.

3. Findings from Dataset B (companies)

Table 2: Headline plastic claims of five listed FMCG companies

Company	Pre-guidelines claim	Post-guidelines claim	Continued?	Stated basis	Quantity reported (post)
Dabur	"Plastic Waste Neutral" (FY2021-22); "Plastic Waste Positive" (FY2022-23 and FY2023-24, 103% processed)	"Plastic Waste Positive" maintained (FY2024-25, >100% processed)	Yes	Collection and processing of post-consumer plastic; earlier report linked neutrality to compliance with PWM Rules	70% recycled, 30% waste-to-energy and cement co-processing (FY2024-25)
ITC	"Plastic	"Plastic	Yes	Collection and	76,000 t

Company	Pre-guidelines claim	Post-guidelines claim	Continued?	Stated basis	Quantity reported (post)
	neutral" since FY2021-22 (over 54,000 t)	neutrality" for fourth consecutive year (FY2024-25), in June 2025 statement		sustainable management of plastic waste	(FY2024-25)
Nestlé India	"Plastic neutral" since 2020	"Plastic neutral" in FY2024-25 and again in June 2026 statement for FY2025-26	Yes	Through CPCB-approved vendors; linked to EPR target assigned by CPCB	~24,600 t (FY2024-25); ~25,000 t (FY2025-26)
HUL	Not verified in a primary source	Collects and processes more plastic than it uses, every year since 2021 (company website)	Yes (post-period verified)	Collection and responsible processing	Not stated on page reviewed
Marico	Not verified	Plastic collected and disposed or recycled "under the EPR framework"; 95.1% of packaging recyclable (FY2025)	n/a	Expressly EPR	75,119 t over three years

Three findings emerge.

i. No visible greenhushing in flagship plastic claims. None of the five companies dropped its headline plastic claim after October 2024. Dabur, ITC and Nestlé India continued using "neutral" or "positive" labels, and Nestlé India repeated its claim in 2026. On this indicator, the answer to the

title's question is: not yet.

ii. The surviving claims are anchored to EPR. Nestlé India ties its neutrality to CPCB-approved vendors and its EPR target. Marico describes the same kind of activity plainly as EPR compliance, without a "neutral" label. Dabur's earlier report linked its neutrality claim to compliance with the Plastic Waste Management Rules. So the same legal obligation is presented by some companies as a distinctive green achievement and by others as ordinary compliance. This matches the prediction in Part 4: claims survive where a statutory system backs them.

iii. The labels hide what counts. Dabur's "Plastic Waste Positive" status for FY2024-25 includes 30% of plastic sent to waste-to-energy plants and cement kilns. That is legal processing, but a consumer is unlikely to read "plastic positive" as including burning. The CCPA Guidelines ask whether the overall impression is accurate, not only whether each number is true. That point has not yet been tested for EPR-based claims.

One signal from outside India points in the other direction. Unilever PLC, HUL's parent, said in its 2025 annual report that it had again collected more plastic than it sold, but that this "will no longer be a formal target". This is not greenhushing of a claim, since the company still reports the result. It is a quieter form: withdrawing a public commitment against which the company could be held to account. Whether HUL follows its parent is worth watching.

4. Limitations

- **Small and non-random sample.** Five companies and one issue cannot represent the FMCG sector.
- **No causal claim.** The data show a pattern consistent with the doctrinal argument, not that the law caused it.
- **Mixed source quality.** Some post-period statements (ITC's) are taken from trade-press reports of company releases, not the companies' own reports.
- **Gaps.** Two pre-period cells could not be verified, and ASCI's FY2025-26 green data were not separately published.
- **Scope.** Small, digital-first brands, which dominate ASCI's green-claims cases, are outside Dataset B. They may be where greenhushing, or simple withdrawal of claims, is actually happening.

Comparative Analysis: the EU approach

The EU's Empowering Consumers for the Green Transition Directive (Directive (EU) 2024/825) applies from 27 September 2026. It amends the Unfair Commercial Practices Directive by adding

practices that are prohibited in all circumstances. These include:

- generic environmental claims without recognised excellent performance
- claims about a whole product or business that concern only one aspect of it
- offset-based claims that a product has a neutral or positive climate impact
- presenting legal requirements as a distinctive feature of the product

The last rule is the most relevant for India. Under it, a claim that essentially describes compliance with a mandatory EPR target would be hard to present as a green achievement. Indian law has no equivalent rule. The separate EU Green Claims Directive proposal was withdrawn in 2025, so the EU also has no general pre-approval system for claims. The EU model is therefore stricter on *what* may be claimed. Like India, it does not require companies to communicate.

Recommendations and conclusion

Five targeted reforms follow from the analysis.

Stop presenting EPR compliance as a green achievement. The CCPA should clarify, by guidance or amendment, that claims such as "plastic neutral" or "plastic positive" based wholly or mainly on mandatory EPR obligations must say so on the same medium. They should also state what share was recycled and what share was burned or co-processed.

Tie EPR-based claims to verified certificates. Where a claim relies on EPR certificates, it should be acceptable only if the certificates have passed CPCB's audit process. Otherwise the fake-certificate problem passes straight into consumer claims.

Publish enforcement. Our searches up to September 2026 found no publicly reported final CCPA order applying the Greenwashing Guidelines. Public orders, even a few, would tell companies what a compliant claim looks like and reduce the uncertainty that drives silence.

Create a safe route for accurate claims. Model claim formats, such as "X% recycled content, verified by Y", would lower the cost of honest speech. This is the most direct counter to greenhushing.

Keep reporting the data. ASCI should continue to publish green-claims figures every year so that trends can be tracked.

To conclude, Indian law now makes unsupported green claims risky and silence costless. Yet the largest FMCG companies have not gone quiet about plastic. They have kept their flagship claims and increasingly anchor them to the EPR system. The quiet turn, if it is coming, is not yet visible at the top of the market. The more immediate problem is that the most confident green claims in Indian FMCG rest on a compliance system whose certificates have been faked at scale. Regulators

should make those claims more honest before worrying about companies falling silent.

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Appendix A: Dataset with sources

A1. ASCI green-claims data

Period	Data point	Value	Source (ref.)
FY2023-24	Green-claim ads examined	34	[5], [6]
H1 FY2024-25	Green-claim ads examined	100	[5]
H1 FY2024-25	Identified by proactive monitoring	99%	[5]
H1 FY2024-25	Required modification	100%	[5]
H1 FY2024-25	Not contested	47%	[5]
H1 FY2024-25	Reported to government	28%	[5]
FY2024-25	Green-claim ads examined	211	[6]
FY2024-25	Required modification	100%	[6]
FY2024-25	Not contested	45%	[6]
FY2024-25	Escalated to regulator	14%	[6]
FY2024-25	By category	Home care 98; fashion & lifestyle 34; personal care 19	[6]
H2 FY2024-25	Green-claim ads examined	111 (derived: 211 − 100)	[5], [6]
FY2025-26	Green claims as separate category	Not reported	[7], [8]

A2. Company plastic claims

Company	Period	Data point	Source
Dabur	FY2021-22	Plastic Waste Neutral; neutrality described as compliance with PWM Rules, 2016	https://www.dabur.com/digital-annual-report-2021-22/
Dabur	FY2023-24	Plastic Waste Positive;	https://www.dabur.com

Company	Period	Data point	Source
		103% processed; ~73% recycled, 27% waste-to-energy/cement	/digital-annual-report/integrated-reports/natural-capital.html
Dabur	FY2024-25	Plastic Waste Positive maintained; >100% processed; 70% recycled, 30% waste-to-energy and co-processing	https://www.dabur.com/digital-annual-reports/integrated-reports/natural-capital.php
ITC	FY2021-22	Plastic neutral; over 54,000 t managed	https://packagingsouthasia.com/supply-chain-function/waste-recycling/itc-plastic-neutrality/
ITC	FY2024-25 (June 2025 statement)	Plastic neutrality, fourth year in a row; 76,000 t	https://packagingsouthasia.com/application/itcs-no-plastic/ (trade-press report of company release)
Nestlé India	FY2024-25	Plastic neutral since 2020; ~24,600 t via CPCB-approved vendors; linked to CPCB EPR target	https://www.nestle.in/csv/environment/packaging
Nestlé India	FY2025-26 (June 2026 statement)	Plastic neutral since 2020; ~25,000 t	https://www.nestle.in/media/pressreleases/allpressreleases/nestl%C3%A9-india-reinforces-commitment-waste-free-future-world-environment-day
HUL	Post-period (website)	Collects and processes more plastic than it uses, every year since 2021	https://www.hul.co.in/sustainability/plastics/
HUL	Pre-period	Not verified in primary source	—

Company	Period	Data point	Source
Marico	FY2025 (BSE filing, 5 June 2025)	75,119 t collected and disposed or recycled over 3 years under EPR; 95.1% packaging recyclable	https://bsmedia.business-standard.com/_media/bs/data/announcements/bse/05062025/0c5eecc5-5d7a-4e4c-83c7-c67a2d1b9fe7.pdf
Marico	Pre-period	Not verified	—
Unilever PLC (HUL parent)	2025 annual report	Collect-more-than-sold result continued but dropped as a formal target	https://resource-recycling.com/plastics/2026/03/23/unilever-shifting-focus-to-flexibles-targets/

A3. Coding rules used

- **Claim label:** "neutral", "positive", descriptive ("more than we use"), or EPR-framed.
- **Continued:** the same or an equivalent claim appears in a source dated after 15 October 2024.
- **Stated basis:** only what the company's own statement says. No inference was made.
- **Missing data:** recorded as "not verified"; never estimated.

Checks before submission: (1) read the official CCPA Guidelines PDF and confirm clause numbers; (2) replace trade-press sources for ITC with ITC's own report or release; (3) fill the two "not verified" pre-period cells from HUL's and Marico's FY2023-24 annual reports; (4) search SCC Online and Manupatra for any CCPA greenwashing orders after this draft date.