The George Institute for Global Health
ABN 90 085 953 331

Level 8, Health Translation Hub
55 Botany Street
Randwick NSW 2031
AUSTRALIA

PO BOX 6366
UNSW SYDNEY
NSW 1466 AUSTRALIA

T: +61 2 8052 4300
F: +61 2 8052 4301

info@georgeinstitute.org
www.georgeinstitute.org

12 September 2025

Committee Secretary
Senate Standing Committees on Environment and Communications
Parliament House
Canberra ACT

Dear Sir/Madam,

Environment and Communications References Committee Inquiry into Greenwashing

The George Institute welcomes the opportunity to provide a submission to the Inquiry into Greenwashing. In responding to the Inquiry's Terms of Reference, we briefly outline our research and initiatives that focus on the environmental sustainability of foods and beverages available from Australian food and alcohol retailers. Our activities in this area include evaluating the environmental impacts of products, monitoring and assessing environmental claims made on product packaging, and empowering consumers to make genuinely more sustainable choices.

The food industry has a significant impact on the environment (1, 2). The recent investigation into greenwashing undertaken by the Australian Competition and Consumer Commission (ACCC) found the food and beverage sector to be amongst those with the highest prevalence of "concerning environmental claims" (3). Our research shows that environmental claims are commonly applied to foods and drinks, including alcohol products, and that diverse claims are made, increasing the likelihood of confusing consumers. Concerningly, we have also found that the presence of such claims does not necessarily signal more environmentally friendly products. This suggests that while industry considers such claims to provide some value in promoting products and influencing purchases, they can make it difficult for consumers to identify sustainable options and make informed decisions.

In a context where greenwashing is rife and tangible industry action on sustainability is not assured, consumers need an objective, evidence-based tool to cut through the marketing spin (1). **Our key recommendation is the adoption of an objective, clear and accessible front-of-pack and online sustainability label, based on robust data and applied to all foods and beverages, to empower consumers to see through greenwashing and make informed, sustainable choices**. The ecoSwitch application developed by The George Institute demonstrates the potential of this information in the context of food and beverages,

and could be readily adopted by the Australian Government – see below for further information.

Please do not hesitate to contact me on spettigrew@georgeinstitute.org.au or via FoodPolicyAdmin@georgeinstitute.org.au for further information about this work. Several of the analyses outlined below are not yet published, as noted, however further detail may be provided in confidence upon request. Additional data and analysis, based on our FoodSwitch database of more than 40,000 products collected annually from Australian supermarket and alcohol retailers, may also be available.

Term of Reference a: the environmental and sustainability claims made by companies in industries including energy, vehicles, household products and appliances, food and drink packaging, cosmetics, clothing and footwear

Across 27,738 packaged foods and non-alcoholic beverages available in Australian supermarkets in 2024, around two-fifths made at least one sustainability claim. “Natural”, “vegan” and “organic” references were most common. A large variety of sustainability claims, including some vague, generic or unsubstantiated, were identified. Please note that these results are currently under peer review and not yet publicly available.

Products bearing sustainability claims were found to have produced fewer greenhouse gas emissions overall, although this differed by product category. For example, meats and confectionery displaying such claims were higher greenhouse gas emitters than products in these categories without them. Products adopting certain claims, such as generic references to “sustainability”, were also higher emitters, on average, than products displaying other claims (such as “vegan” and “organic”). Please note that these results are also under review and not yet publicly available.

Alcohol products are also beginning to adopt claims directly referencing environmental concerns (e.g. specific mentions of “sustainability” or greenhouse gas emissions and abatement programs). In a recent collection of nearly 6,000 alcohol products, we found almost one in ten made these types of claims, most commonly on beers. Please note that these results are under review and not yet publicly available.

Term of Reference b: the impact of misleading environmental and sustainability claims on consumers

In a recent qualitative study conducted by The George Institute that explored awareness and perceptions of sustainability information on food packaging, focus group participants noted the prevalence of greenwashing tactics and identified these as a form of marketing. Participants were particularly sceptical about the food industry’s application of sustainability labels, although reputable third-party or government labels would be more trusted. However, it was also commonly reported that factors such as price and healthiness were a higher priority than environmental sustainability. Please note that these results are under review and not yet publicly available.

Term of Reference e: legislative options to protect consumers from greenwashing in Australia

The mandatory display of clear, robust and holistic information about environmental impacts, via readily accessible and easily understandable sustainability labels, would support informed consumer choices and encourage improved industry practices. Stringent controls on environmental claims will also help prevent misleading conduct and protect consumers from greenwashing. Finally, guidance on sustainable dietary patterns could be provided through revised Australian Dietary Guidelines.

The George Institute's award-winning ecoSwitch application (5, 6), which allows consumers to quickly identify products that are better or worse for the environment, demonstrates the potential of an easy-to-use sustainability label. This application provides information on the environmental impact of tens of thousands of foods sold in Australian supermarkets, drawing on a novel methodology developed by our researchers (2). This complex data is translated in the form of a colour-coded Planetary Health Rating that scores products from half a star (less sustainable) to five stars (more sustainable). The evidence-based platform we have developed could be adopted by the Australian Government as a front-of-pack and online tool to provide independent and reliable environmental information to consumers (1), with the potential to redress information asymmetries and shift consumer preferences and purchases. Ultimately, such a tool would support consumer choice, incentivise industry to improve their practices, and facilitate better monitoring of misleading or deceptive conduct by regulators and enforcement agencies.

Claims about the healthiness of foods and beverages, including alcohol, are regulated via the Australia New Zealand Food Standards Code. Standard 1.2.7 (Nutrition, health and related claims) explicitly encompasses claims made both on product packaging and in marketing material. The legislation underpinning the Commonwealth agency overseeing these regulations, Food Standards Australia New Zealand (FSANZ), has been under review since 2020. Public health and consumer representatives, including The George Institute (7), have consistently called for this review to expand FSANZ's remit to include environmental considerations, to enable food regulations to support food systems that are healthy, sustainable and secure. Incorporating environmental sustainability would allow FSANZ to regulate environmental claims made for foods and drinks, in line with FSANZ's legislated objectives to provide adequate information to enable consumers to make informed choices and to prevent misleading or deceptive conduct. To date, the Australian Government has not agreed to proposals to incorporate environmental issues in food standards.

The Australian Dietary Guidelines are under review, with the potential to include environmental considerations currently being explored. Incorporating the environmental impacts of products into this formal, government-endorsed guidance on dietary patterns, as is the case in New Zealand and dozens of other countries around the world, will raise

awareness and better inform consumers and nutrition practitioners, as well as support government policy to improve the sustainability of food systems. However, strong controls on conflicts of interests that were introduced to protect the broader review process from commercial influences have been suspended for this component of the review. Potentially implicated industries have been directly and specifically included in a working group providing advice on evidence regarding diets and sustainability. The potential for businesses profiting from environmentally damaging practices to influence this process in their favour remains of great concern.

Term of Reference f: any other related matters

Weak regulatory forms, such as self- and co-regulation, have not been effective in improving the practices of the food and alcohol industries with regards to public health in Australia, and they have largely not made positive changes of their own accord. This includes in areas such as labelling (8, 9) and marketing (10, 11). Strong controls on environmental claims and mandatory sustainability labelling will help ensure that greenwashing of food and drinks is minimised, and consumers can make informed and impactful decisions.

Inherent and irreconcilable conflicts of interest exist amongst potentially affected industries, given the commercial imperatives of those that profit from the sale of unsustainable products. It is therefore critical that safeguards be introduced to protect the development of any policy regulating environmental claims or labels from being undermined by those with commercial conflicts of interest; while it remains appropriate to consult relevant parties on potential reform, groups with a commercial interest in the outcomes should not be involved in designing policy. This will improve both the capacity of a regulatory system to effectively change industry practices and promote consumer confidence. We also advise caution when assessing industry self-reporting of potential costs/benefits, preferences and intentions on this basis.

About The George Institute for Global Health

The George Institute is a leading global medical research institute, founded in Sydney, Australia, and with major centres in China, India and the UK. Our mission is to improve the health of millions of people worldwide, particularly those living in resource-poor settings, by challenging the status quo and using innovative approaches to prevent and treat noncommunicable diseases.

Our Food Policy Division works in Australia and overseas to reduce death and disease caused by unhealthy products and improve the healthiness and sustainability of food systems. The team conducts multi-disciplinary research with a focus on generating outputs that will help government, industry and communities to realise these benefits. Members of the Food Policy Division regularly engage with and consult to governments as well as

international organisations such as the World Health Organization, UNICEF, Resolve to Save Lives and the Gates Foundation.

Kind Regards
Professor Simone Pettigrew

Program Director & Professorial Fellow, Health Promotion, Food Policy
The George Institute

References

1. Pettigrew S, Taylor F, Hunnisett C, Hadjikakou M. Sustainable diets: Empowering consumers in the face of regulatory tardiness. Australian and New Zealand Journal of Public Health. 2024;48(3):100151.
2. Gaines AM, Davies T, Shahid M, Taylor F, Wu JHY, Hadjikakou M, et al. A novel approach to estimate product-specific greenhouse gas emissions for 23,550 Australian packaged foods and beverages. Journal of Cleaner Production. 2023;425:138816.
3. Australian Competition and Consumer Commission. Greenwashing by businesses in Australia: Findings of the ACCC's internet sweep of environmental claims. Canberra: ACCC; 2023.
4. Sträuli B, Booth L, Laznik N, Pettigrew S. Type and prevalence of nutrition-related claims on alcoholic ready-to-drink beverages. Australian and New Zealand Journal of Public Health. 2023;47(6):100106.
5. The George Institute for Global Health. 'ecoSwitch' recognised at 35th Banksia Awards for sustainability. Available from: https://www.georgeinstitute.org/news-and-media/news/ecoswitch-recognised-at-35th-banksia-awards-for-sustainability.
6. The George Institute for Global Health. ecoSwitch App. Available from: https://www.georgeinstitute.org/our-research/research-projects/ecoswitch-app.
7. The George Institute for Global Health. Review of the Food Standards Australia New Zealand Act 1991 (the Act) submission on the impact analysis 2024. Available from: https://www.georgeinstitute.org/our-impact/policy-statements-and-recommendations/review-of-the-food-standards-australia-new-zealand-act-1991-the-act-submission-on-the-impact.
8. Jones A, Maganja D, Shahid M, Neal B, Pettigrew S. Voluntary versus mandatory food labels, Australia. Bull World Health Organ. 2024;102(10):691-8.
9. Heenan M, Shanthosh J, Cullerton K, Jan S. Influencing and implementing mandatory alcohol pregnancy warning labels in Australia and New Zealand. Health Promotion International. 2022;38(3).
10. Jongenelis MI, Pierce H, Keric D, Stafford J, Jongenelis G, Pettigrew S. Are Australian regulatory codes adequate in scope to protect youth from alcohol advertising? Health Promotion Journal of Australia. 2021;32(S2):212-7.
11. Jones A, Shahid M, Morelli G, Howes K, Riesenberg D, Sievert K, et al. Chocolate unicorns and smiling teddy biscuits: analysis of the use of child-directed marketing on the packages of Australian foods. Public Health Nutr. 2023;26(12):3291-302.