
**THE ENFORCEMENT OF THE ECO MARK CERTIFICATION LEGAL
FRAMEWORK IN INDIA AND ITS IMPACT ON COMPANIES'
GROWTH THROUGH GREENWASHING PRACTICES**

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Published on: 14 July 2025University of Madras. Email Id: advocategayathriumapathy@gmail.com.**ABSTRACT**

In recent years, the increasing demand for environmentally sustainable products has led companies to market their goods as eco-friendly to gain consumer trust and market advantage. However, the rise of greenwashing, the practice of falsely claiming environmental responsibility, has raised serious concerns about the authenticity of such claims and the effectiveness of regulatory mechanisms in place to address them. This study critically examines the Eco Mark Certification legal framework in India, assessing its role in ensuring environmental compliance and preventing deceptive green marketing. It further explores how greenwashing influences stakeholders, distorts market behaviour, and impacts corporate growth both positively and negatively. This study aims to identify regulatory gaps and evaluate the enforcement of existing laws. The research tests the hypothesis that the current Indian legal framework for eco-labelling is insufficient to curb greenwashing practices, thereby calling for stronger legislative and institutional reforms.

KEYWORDS: Greenwashing, Eco Mark, Environment, Company, and Stakeholders.**INTRODUCTION**

Environmental sustainability has emerged as a critical concern globally, driving both consumers and corporations toward eco-conscious practices. In this context, *eco-labelling schemes* like the Eco Mark Certification in India aim to identify and promote products with minimal environmental impact. Introduced in 1991 and recently revised through the Eco Mark Rules, 2024, this certification serves as a tool for environmental governance and sustainable consumption. However, the growing trend of greenwashing, where companies

deliberately mislead consumers about the environmental benefits of their products or services, poses a significant threat to the credibility and effectiveness of such certification mechanisms.[1]

Greenwashing not only undermines consumer trust but also skews market competition and impedes genuine sustainability efforts. It affects a wide range of stakeholders, including consumers, regulatory bodies, investors, and environmental groups, while also influencing the trajectory of business growth through either short-term gains or long-term reputational risks. This paper aims to explore the relationship between greenwashing and the existing Eco Mark legal framework, examining whether current enforcement measures in India are robust enough to prevent deceptive environmental claims. This study focuses on three key *objectives*: to analyze the structure and enforcement of the Eco Mark Certification framework in India; to assess the impact of greenwashing on corporate growth; and to evaluate the sufficiency of existing Indian legal mechanisms in addressing greenwashing practices. This research falls under the purview of *doctrinal study*, whereas the researcher has relied on Primary sources such as Legal rules, schemes, and Acts, and Secondary Sources such as Articles, Journals, and Books on the subject matter. The study *hypothesizes* that the Indian Legal Framework on Eco Mark Certification is ineffective in preventing greenwashing.

Evolution of Greenwashing

Greenwashing evolved along with industrialization and the necessity to attract stakeholders to purchase the products and services that are proclaimed to meet the environmental credentials rendered by the companies. At the beginning of the industrialization era, the developed countries took great advantage of their dominating position to exploit the environment by polluting and depleting its resources. The severe increase in the industry's carbon emissions has affected the environment as a whole, thereby causing climate change. This has made several countries come forward to take initiatives to protect the environment. The Stockholm Declaration of 1972 was one such important convention that laid down for the first time the need to protect and promote the environment. Thereby, the pressure was shifted on both the Government and the Industries/Companies/Organisations to adopt measures to protect and promote the environment. The growing concern among stakeholders to purchase and use environmentally friendly products prompted many organisations to engage in unethical and deceitful practices.[2]

The existence started in the 1980s when the phrase "greenwashing" was used to characterize ludicrous environmental claims made by corporations. Environmentalist Jay Westerveld used the term "greenwashing" for the first time in 1986, which is also known as "green sheen". Greenwashing is a marketing spin in which Green PR (Public Relations) and Green marketing are employed to dishonestly convince the public that a company's goals, policies, and goods are environmentally friendly. An organization engages in greenwashing when it devotes a disproportionate number of resources to promoting its "green" credentials rather than implementing ecologically responsible practices. Greenwashing is the practice of renaming or labelling a product to make it seem more natural or eco-friendly, but in reality, it would harm the environment to the core. Presenting non-environmentally or climate-friendly products as environmentally or climate-friendly is known as "greenwashing." This is a problem in many countries. Greenwashing serves to mask corporate ambitions and policies that are not sustainable. It has gained popularity due to widely reported accusations from several sectors of the industry. It is a tactic several businesses use to enhance public perception of their brands. In response to customer demand for environmentally friendly products and services, there has been a rise in "greenwashing" due to which the stakeholders are made victim to misleading advertisements which thereby affects the reputation and profit of such companies. The main goals of greenwashing are profit maximization and projecting a corporation as environmentally conscious. It is accomplished by launching a product that satisfies the innate consumer need for environmentally friendly goods. "*Sustainable*", "*Eco-Friendly*", "*Ethical*", and "*Eco-Conscious*" are the words frequently used in corporate marketing to mislead consumers into believing the products are environmentally friendly as authorized by these organizations. But not all businesses engage in greenwashing; many organisations actively participate in promoting the environment rather than falsely advertising their products as eco-friendly.[3]

In the era of corporate social responsibility (CSR), companies' priorities must extend beyond shareholder value, investment return, and profit. Organizations now require a strong social and environmental performance, sometimes known as the "triple-bottom-line" or "people/planet/profit" performance review,[4] Organizations are expected to limit the adverse aspects of their business as much as possible and to make positive societal contributions. Carroll,[5] developed a four-layered "pyramid of social responsibilities" to encapsulate these expectations. The pyramid base represents economic responsibilities, which directly affect an organization's viability. The next layer represents the Legal responsibilities, which state that

organizations must abide by laws and regulations. Another layer symbolizes ethical responsibilities—behaviours that are recognized as moral and just but are not codified into laws and regulations. The pyramid's uppermost tier depicts philanthropic responsibilities, which involve making further contributions to society or humankind. Companies follow these CSR policies for 4 basic motives: To contribute to society, to generate Financial or other benefits, to meet social expectations, and to reduce stakeholder pressure. Further, the implementation of these CSR Initiatives has various benefits, whereby the reputation, brand value, consumer purchase, and loyalty increase.[6]

Impact of Greenwashing on Stakeholders, Environment and Companies Growth:

Greenwashing has a negative impact on the Stakeholders, the Environment, and the company's Growth. The gap between declared CSR Goals and Execution, where there are fewer attained or executed goals affects the stakeholder's satisfaction level thereby making the company's efforts or greenwashing technique as corporate hypocrisy and disparity. The meaning of Greenwashing has significantly changed, previously it was used to point out the misleading environmental claims by the company. However, now consumers tend to frame the ineffective implementation of the company's CSR Goals as Greenwashing, which is fatal for the company's reputation and growth. The failure to execute the CSR or environmentally friendly goals might also result from inadequate fund resources or other unintentional factors. In total, greenwashing harms the Brand Name and reputation of the Company and tends to deprive the brand loyalty and consumer purchase interest towards its products and services, which affects the economic growth, manufacturing, production, and sale value of the company. Due to the development of legal and regulatory frameworks to monitor the company-consumer approach and due to the increasing need to protect consumer interest, the companies that are engaged in Greenwashing also face Regulatory and Legal Risks, which include a hefty amount of compensation.[7]

Impact on Stakeholders

Consumers

The experience of a consumer with a company's product or service is adversely affected due to greenwashing. Nowadays, customers are more conscious than ever about greenwashing. Additionally, customers are more inclined to select goods and services from businesses that they believe to be truthful and open about their environmental policies. A company's reputation can suffer greatly if it is exposed to greenwashing. Customers can feel deceived

and duped, and they might be less inclined to believe in the business, which adversely affects sales and client loyalty. The negative news affects the company's growth in many ways. Due to the increased use of social media platforms, this news about greenwashing spreads across the country, thereby deterring other potential consumers from purchasing the products or services and breaking the trust of the company. Further, this damage may extend even after the companies have formally apologized or modified their CSR initiative. Further, it has a devastating impact on consumer trust, where it could easily lead to a Decline in sales, a Switch of the consumer to Competitors, Damage to the company's reputation, and severe Regulatory Scrutiny which may result in heavy compensation or worse scenario a black mark or prohibition to sale or render any goods or services.[8]

Investors

The greenwashing has a devastating effect on the Investors, who serve as another backbone of the company. The investors are affected when the company's sustainable goals are misleading and are not implemented. The sustainable goals are challenged when there are inconsistent disclosures, omissions of key information regarding the sustainability goals or strategy, unsubstantiated sustainability claims, or undue emphasis on certain features that could appear to exaggerate the actual sustainability characteristics of a fund. Greenwashing is a major concern in the investment management industry. It can erode the trust and confidence in the investment industry. Additionally, it may lead to investors misallocating funds to schemes or goods that conflict with their financial objectives. 4 important factors damage the trust of the investors: Omission to implement the CSR environmentally sustainable claims, unsubstantiated claims, inconsistency between fund materials, and exaggeration.[9]

- The failure to disclose any important information, such as investment strategy and investment details, would lead to omission.
- Unsubstantiated claim means any claim made without appropriate evidence to prove its existential value.
- Inconsistency in any information regarding the Environmental claim or standards
- Exaggeration of the environmental goals or fund claims.

Further companies with a greenwashing history and on which severe regulatory enforcement actions had been taken would be disinvested by their investors, and their present partnership or future potential partnership would be terminated or reduced.[10]

Environment

Greenwashing may also negatively affect the environment in several ways. Customers are more prone to make environmentally destructive decisions when they are misinformed about how goods and services will affect the environment. Additionally, greenwashing may result in the production of goods and services that are not as ecologically friendly as they purport to be. For instance, to minimize costs, a business that greenwashes its goods could employ less environmentally friendly materials or production techniques.[11]

It could cause

- Pollution due to non-environmentally friendly manufacturing processes, transportation, and product disposal.
- Depletion of natural resources like water, minerals, and forests
- Biodiversity loss by damaging ecosystems and habitats - Greenwashing can be a contributing factor to biodiversity loss.
- Climate change by raising greenhouse gas emissions - greenwashing can harm the climate.[12]

Companies Growth

Regulatory Action: The misleading environmental claims would invoke regulatory enforcement action from the State's Independent Authority. The Advertising Standards Council of India (ASCI) and the Bureau of Indian Standards (BIS) are the main regulatory agencies for Greenwashing in India.[13]

Legal Suit and Damages: Legal action and compensation not only affect the finances of the company but also damage the reputation of the company.

Greenwashing affects the company's growth by affecting its Stakeholders.

Legal Framework on Eco Mark Certification In India and its Enforcement

The importance of implementing a legal framework on greenwashing contributes to society's view on Environmental Protection. After the 18th Century, the world witnessed the great growth of industrialization, which changed the way how the economy and World Trade worked. The growing concern over environmental depletion and pollution has paved the way for implementing several International Conventions, Declarations, and Treaties in Municipal Law. After the Stockholm Declaration of 1972, and the Rio Declaration of 1992 several other

conventions were adopted by the States. The Paris Agreement 2015, which fell under the umbrella of UNFCCC (United Nations Framework Convention on Climate Change), focused on several factors that were harming the Environment. It was predominantly against climate change, which was the direct effect of the increased amount of carbon emissions by Industrialization. Due to these Conventions, several Sustainable standards were laid down to protect the environment and to repair the harm already caused. Due to the devastating change in the climate, severe pollution, rise in sea levels, drought, food scarcity, and depletion of resources, many countries raised their environmental standards thereby regulating Companies, Industries, and organizations to reduce their impact on the environment. Pressurized by these regulations, few organizations were able to abide by the standards and make products or services that are environmentally friendly, but other organizations, to attract more stakeholders and maximize their profit through domestic and international trade, had deliberately engaged in Greenwashing thereby making false environmental claims.[14]

To regulate these unethical practices, many countries such as the USA and European Union, have laid down their standard of legal frameworks. However, these standards were implemented in India only after the 19th Century.

Legal Frameworks

- ***The Advertising Standards Council Of India (ASCI)***

Since its founding in 1985, ASCI has worked to promote self-regulation in advertising, safeguarding consumer interests while being fair to the advertising industry. The 4 sectors that are responsible for the formation of ASCI are Advertisers, Advertising Agencies, Media and PR Agencies & Market Research Companies, etc. The ASCI is a voluntary self-regulation council, that functions as a watchdog for advertisements to meet certain standards. The main purpose of this code is to control the content of advertisements. However, it is not a government body and it cannot formulate any rules for the public or such relevant industries. As it has been formed by the advertisers, their agency, and business organizations it can only self-regulate the ethical standard of such advertisements evolving in such sectors. The ASCI has no enforcement mechanism, it cannot punish or issue sanctions like the government enforcement agency, however, it can only look into the complaint and self-regulate the violation of its code by way of directing the removal or modification of such advertisements, issue guidelines and codes for maintaining the standard of the advertisements. The

companies that advertise must provide scientific evidence to support any environmental claims made by them in their advertisements,[15]

- ***The Bureau Of Indian Standards (BIS)***

BIS is the National Standard Body of India established under the BIS Act 2016, which formulates and enforces standards for products, services, and processes in India. It has implemented the Eco Mark Scheme or Green Product Certification Scheme, which has developed standards for products that are marketed as eco-friendly. It regulates whether the eco-labelled products meet the standard.[16]

- ***The Consumer Protection Act 2019***

The Consumer Act is an important enforcement agency with respect to safeguarding consumer rights and holding companies liable for unfair trade practices. False and misleading claims about the environmental benefits or claims of a product or service are unfair trade practices, which are prohibited by the Consumer Act.[17]

- ***Third-Party Certification***

The phrase "third-party certification" is broad and can refer to different types of processes, standards, or organizations that verify or evaluate the quality, performance, or compliance of a product, service, or system. Third-party certification has been widely regarded as a vital means of regulating greenwash, however, it has a limited approach to curbing it completely. *"Verifying a product, service, or organization's environmental or social claims by an impartial, reliable third party is known as a third-party certification"*. It can assist investors and consumers in making wise decisions and preventing themselves from falling for greenwashing. Third-party certifications have taken over the role of several self-regulatory bodies due to their inability to create and implement sustainable environmental management standards effectively or efficiently. A major hindrance to the effective performance of these third-party certifications is that they are not given by the Government but by the private sector, which paves the way for corruption or ineffectiveness of standards.[18]

- **Eco Mark Certification Act, 2023: Draft Framework for Eco-Labeling and Sustainable Consumption**

The *Ecomark Certification Act, 2023* refers to a draft notification released by the Ministry of Environment, Forest and Climate Change (MoEF&CC) on 11th October 2023. This draft outlines a regulatory framework for the development and implementation of the Eco mark

certification scheme, which is intended to label products that exhibit reduced environmental impact while simultaneously meeting established quality standards in accordance with Indian norms. The proposed scheme aims to promote the adoption of environmentally friendly products by consumers, support the government's *Lifestyle for Environment (LiFE)* initiative, and facilitate manufacturers' transition to sustainable production methods. The overarching goal is to contribute meaningfully to sustainability objectives and foster a circular economy. The key features of the Draft Notification are:

- **Certification Procedure:** Manufacturers are required to submit applications to the Central Pollution Control Board (CPCB), along with relevant documentation. The CPCB is tasked with verifying whether the products meet the eco-labelling criteria prior to issuing or renewing certification.
- **Environmental Criteria:** The environmental standards for various products or product categories will be determined and notified by the Central Government. These criteria will evaluate the environmental performance of products based on several parameters, including pollution potential, waste management practices, emission levels, energy efficiency, and recyclability.
- **Compliance with Quality Standards:** In addition to meeting environmental benchmarks, products must also conform to applicable quality and safety standards, including Quality Control Orders (QCOs) and relevant national or international norms.
- **Monitoring and Enforcement:** The CPCB, along with accredited third-party agencies, will conduct market surveillance to ensure ongoing compliance with the certification standards. The framework includes provisions for penalizing entities found to be engaging in fraudulent or non-compliant practices, thus safeguarding the integrity of the scheme.

The draft *Eco Mark Certification Act, 2023*, represents a notable advancement in India's environmental policy framework. It seeks to institutionalize eco-labelling through a formal certification process that aligns environmental integrity with quality assurance. By fostering sustainable production and consumption patterns, the draft regulation is poised to contribute significantly to India's environmental goals and its broader commitment to sustainable development. However it has not been passed by the Parliament and was finalized and notified as Eco Mark Rules, 2024, which replaced 1991 Eco Mark Scheme.[19]

- *Eco Mark Scheme*

The Bureau of Indian Standards (BIS) has established specific environmental compliance standards to ensure that products bearing the Eco mark uphold environmental integrity and authenticity. The presence of the Eco mark on a product assures consumers that the manufacturer adheres to these BIS-defined standards, thereby enhancing trust in the product's environmental safety and quality. The Eco Mark is a certification label awarded by the Bureau of Indian Standards (BIS), the national standardization authority of India, to products that meet specific environmental criteria aimed at minimizing ecological harm. Initiated in 1991, the Eco mark scheme seeks to promote consumer awareness about the environmental impacts of products and encourage environmentally responsible consumption.

The Ministry of Environment, Forest and Climate Change (MoEF&CC) is the nodal agency for this eco-labelling initiative, while the operational responsibilities lie with the BIS. The primary objective of the Eco mark scheme is to recognize products that are environmentally friendly throughout their lifecycle and to provide a credible symbol that enables consumers to make informed choices. Under this scheme, manufacturers of products falling under specified categories can apply for certification, provided their products comply with the defined environmental standards. BIS oversees the testing and certification process, which includes inspecting facilities and analyzing product samples to ensure compliance. Upon satisfactory evaluation, BIS grants a license to use the Eco mark, which remains valid for a stipulated period and is subject to renewal, suspension, or cancellation based on continued compliance. All procedures are governed by the BIS Act of 2016 and its associated regulations. For products that already possess the Indian Standards mark, BIS aims to complete the certification process within approximately three months. Reassessment and license renewal are required after the expiry of the initial certification period, with applicable fees. Despite its intent to empower environmentally conscious consumers, the effectiveness of the Eco mark scheme has been challenged by issues such as limited public awareness and inadequate regulatory enforcement. These shortcomings have facilitated "greenwashing," where corporations falsely advertise their products as environmentally beneficial. As with similar voluntary and market-based ecolabelling initiatives adopted globally, the success of the Eco mark program depends on robust implementation, transparency, and consumer education.[20]

Compliance and Certification under the Eco Mark Scheme

- **Encouraging Sustainable Efficiency-** To obtain the Eco mark certification, manufacturers must demonstrate conformity with environmentally sustainable practices throughout the production process. Compliance with these rigorous criteria fosters improved resource efficiency and promotes sustainable development across various stages of the product lifecycle.
- **Enhancing Consumer Awareness-** The Eco mark serves as a visible indicator that a product has met recognized environmental standards. Its presence helps raise awareness among consumers about the environmental implications of their purchases, encouraging them to prefer products that are less harmful to the ecosystem.
- **Certification Process-** Manufacturers interested in using the Eco mark must submit an application to BIS along with the requisite fees. Prior to granting the license, BIS undertakes a thorough inspection process, which includes sampling and analyzing products to verify compliance with the prescribed environmental criteria. Products approved to carry the Eco mark are considered to have reduced environmental impact and contribute positively to environmental conservation by guiding consumer behaviour toward more sustainable choices.[21]

- **The Eco Mark Certification Rules 2024**

The *Eco mark Certification Rules, 2024* or "Eco mark Rules" introduced by the Ministry of Environment, Forest and Climate Change (MoEF&CC) in 2023, represent a significant policy initiative by the Government of India. These rules aim to establish a comprehensive mechanism for the labelling and certification of products and services that meet defined environmental and quality standards. The overarching objective is to advance sustainability by encouraging both consumers and manufacturers to engage with environmentally responsible products. The implementation of the Eco mark Scheme signifies a pivotal development in India's environmental regulatory framework, marking a milestone year. Notably, the Eco mark Rules are designed to function in synergy with the *Green Credit Rules, 2023*. Under this integrated approach, manufacturers who obtain Eco mark certification are eligible to participate in the Green Credit Programme. This program recognizes and incentivizes the environmental value of eco-labelled products by awarding green credits, thereby promoting sustainable production practices and driving market preference for environmentally sound goods.[22]

Eco mark is a certification mark granted by the Bureau of Indian Standards (BIS), India's national standards body. It is awarded to products that comply with specific criteria designed to limit their adverse impact on the environment. The Eco Mark scheme functions as an eco-labelling initiative that distinguishes products with reduced environmental footprints. It serves to encourage sustainable consumption patterns, enhance environmental awareness, and mitigate the risk of misleading environmental claims. The primary objectives of the Eco mark Rules are to promote environmental consciousness among consumers, to encourage producers to manufacture environmentally certified goods, and to prevent the misuse or misrepresentation of the Eco mark label. Ultimately, the rules aim to foster sustainable behavioural patterns and responsible consumption habits in alignment with national and international environmental goals.[23]

The environmental criteria for awarding the Eco mark are to be defined by the Central Government. These standards will encompass both general environmental considerations and product-specific requirements. To qualify for Eco mark certification, a product must demonstrate substantially reduced potential for pollution, enhanced recyclability, conservation of non-renewable resources, and other sustainability-oriented features. Additionally, the product must conform to existing quality and safety benchmarks and comply with applicable Quality Control Orders. The administration of the Eco mark Rules will be overseen by the Central Government through the establishment of a Steering Committee. This committee will include representatives from relevant ministries, regulatory bodies, and other key stakeholders. Its functions will include the development and approval of implementation frameworks, the identification of product categories for inclusion under the scheme, and the monitoring of policy execution.[24]

The Central Pollution Control Board (CPCB) has been designated as the Eco Mark Administrator. It will be responsible for the operational implementation of the rules, including the formulation of certification guidelines, the selection of eligible product categories, the registration of Designated Eco mark Verifiers (DEVs), and the issuance, renewal, and monitoring of Eco mark certificates.[25]

The *Eco Mark Certification Rules, 2024*, establish a structured regulatory framework aimed at promoting the production and consumption of environmentally sustainable products in India. By aligning with global sustainability standards and integrating with the Green Credit framework, these rules offer a significant step forward in reducing the environmental impact

of goods and encouraging responsible manufacturing practices. They also represent a strategic effort to embed environmental considerations into India's broader economic and industrial development.[26]

Conclusion and Suggestion

The study has critically examined the Eco Mark Certification framework in India, especially in light of its enforcement and relevance to greenwashing practices. While the scheme, originally launched in 1991 and revamped through the Eco mark Rules, 2024 was intended to foster sustainable consumption and encourage environmentally conscious manufacturing, its actual impact has remained limited. The regulatory framework, although well-intentioned, has often lacked effective enforcement mechanisms, robust monitoring, and widespread consumer awareness, which has inadvertently allowed room for greenwashing to flourish. Companies, driven by market competitiveness and increasing demand for eco-friendly products, have occasionally misused environmental claims to project a false image of sustainability. This undermines consumer trust and distorts the intent of ecolabelling. Moreover, the absence of specific punitive measures and a dedicated legal mechanism to counter misleading environmental claims has weakened the deterrent effect of the Eco mark certification framework. Thus, the hypothesis that the Indian legal framework on Eco Mark Certification is ineffective in preventing greenwashing is, to a significant extent, validated. A more integrated and accountable system is essential to ensure that eco-labelling genuinely reflects sustainable practices and is not misused for reputational or financial gain.

The following suggestions are raised by the author to prevent greenwashing

- **Strengthen Enforcement Mechanisms**

Regulatory bodies such as the Central Pollution Control Board (CPCB) must be empowered with adequate resources and legal authority to conduct regular audits, enforce compliance, and take swift action against fraudulent Eco mark claims.

- **Introduce Specific Anti-Greenwashing Legislation**

India should consider enacting standalone legislation or amending existing laws (such as the Consumer Protection Act or Environmental Protection Act) to explicitly address greenwashing, define its legal scope, and prescribe clear penalties.

- **Mandatory Disclosure and Transparency Requirements**

Companies should be legally mandated to disclose their environmental claims, backed by third-party verifications. These disclosures should be made publicly available for scrutiny by regulators, consumers, and watchdog organizations.

- **Consumer Education and Awareness Campaigns**

Public awareness of eco-labels and greenwashing must be improved through targeted educational campaigns. Informed consumers are better equipped to identify misleading claims and make sustainable choices.

- **Integration with ESG and CSR Frameworks**

Eco mark compliance should be linked with Environmental, Social, and Governance (ESG) reporting frameworks and Corporate Social Responsibility (CSR) disclosures to ensure that environmental claims align with broader corporate accountability practices.

- **Encourage Third Party Monitoring and Whistleblower Protections**

NGOs, consumer rights organizations, and independent certifying bodies should be allowed to monitor and report instances of greenwashing. Legal protection for whistleblowers can further strengthen enforcement.

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