

SWITCHING OFF GREENWASHING



BEUC The European
Consumer
Organisation

The Consumer Voice in Europe

June 2026



The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

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BEUC-X-2026-053
June 2026



Co-funded by
the European Union

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SUMMARY

What this action is about and why it matters to consumers

Nearly a quarter of final energy consumption comes from households, making consumers key actors in the energy transition. Their choices, however, are strongly influenced by information about energy providers' environmental commitments and the actual impact of energy products. Yet many companies market their offers as environmentally friendly through sustainability claims that obscure which providers are genuinely moving away from fossil fuels, and which options are truly sustainable. This confusion weakens informed decision-making and can deter households from switching to clean, electrified solutions such as heat pumps or solar panels.

Greenwashing slows the transition to sustainable and affordable energy. Continued reliance on fossil fuels exposes households to price volatility and higher bills in uncertain times and challenging geopolitical periods. Misleading claims also allow companies to charge a premium for supposedly 'green' products, harming consumers financially and unfairly disadvantaging companies providing more sustainable energy options to consumers and transitioning away from fossil fuels. **Delivering the EU's transition to secure, affordable and electrified energy requires putting consumers at the centre, with access to genuinely sustainable options and clear, accurate and trustworthy information.**

For this reason, consumer groups have alerted the European Commission and the European network of consumer protection authorities (CPC-Network) about misleading green claims used by **ENGIE, TotalEnergies, Eni Plenitude, and Shell**. Our findings show that greenwashing is a systemic issue in the energy sector and warrants a broader examination of environmental claims made by energy traders also operating at domestic level.

Our demands to the CPC-Network

We call on the CPC-Network under the coordination of the European Commission to:

1

Start a coordinated enforcement action against the targeted energy providers and to publish a joint position on the compliance of these practices with EU law. This will be essential to send a clear and strong signal to the energy providers concerned and, more widely the entire sector, about the misleading nature of the environmental claims identified in this alert.

2

Require the targeted energy providers to stop misleading consumers through climate-related marketing claims and practices. Energy providers whose climate transition plans are not aligned with the Paris Agreement and continue to invest in the extraction and sales of fossil fuels should refrain from marketing to consumers their net-zero emissions or climate neutrality objectives. Energy providers should also not exaggerate the environmental benefits of their activities and products, while omitting their overall highly polluting impacts.

3

Ensure that energy providers do not misleadingly advertise their financial contributions to climate-related projects, notably in ways that suggest that the negative environmental impacts of their emissions, or those of their fossil-fuel based products, such as gas, are neutralised, offset, compensated, or reduced.

4

Monitor the use of climate-related marketing claims by the targeted energy providers and impose fines on the companies if they continue to use such claims (or a variation thereof) in a misleading manner.

5

Where possible, request that the targeted energy providers compensate consumers for marketing energy packages or fossil-fuel based products at a higher price on the basis of misleading environmental claims. If these amounts are small and the concerned consumers cannot be identified easily, the unduly received fees could be dedicated to an environmental or consumer protection cause, to be agreed upon by the CPC-Network.

6

Ensure that consumer groups filing this alert are given a meaningful and timely opportunity to submit their views on those commitments in accordance with Art. 9(8) of EU Regulation 2017/2394, where traders propose commitments to change their practices.

Methodology

Consumer groups conducted the evidence-gathering accompanying this alert between March 2025 and April 2026 and focused on environmental claims displayed on traders' commercial websites where consumers can sign up for electricity or gas contracts, or buy heating oil. Examples of claims reported are listed in the Annex. The alert also builds on the findings and conclusions of the Study *"Misleading Environmental Claims in the EU Energy Sector: Legal Assessment under the Unfair Commercial Practices Directive and the Empowering Consumers Directive"* by Pr. Alberto De Franchesi, Pr. Evelyne Terryn, Pr. Bert Keirsbilck with research assistance by Christopher Borucki, Amelies De Grave, Liesbet Van Acker, Elias Van Gool (KU Leuven) published in June 2026.

Participating consumer groups across Europe

This alert to the Commission and the CPC-Network is coordinated by BEUC (The European Consumer Organisation) together with 12 of our member representing 11 European countries: CECU in Spain, CLCV and Que Choisir Ensemble in France, Consumentenbond in the Netherlands, Consumatori Italiani per l'Europa in Italy, DECO in Portugal, EKPZO and KEPKA in Greece, Federacja Konsumentów in Poland, Forbrugerrådet Tænk in Denmark, Spoločnosť ochrany spotrebiteľov in Slovakia, Verein für Konsumenteninformation in Austria, and BEUC for Belgium.

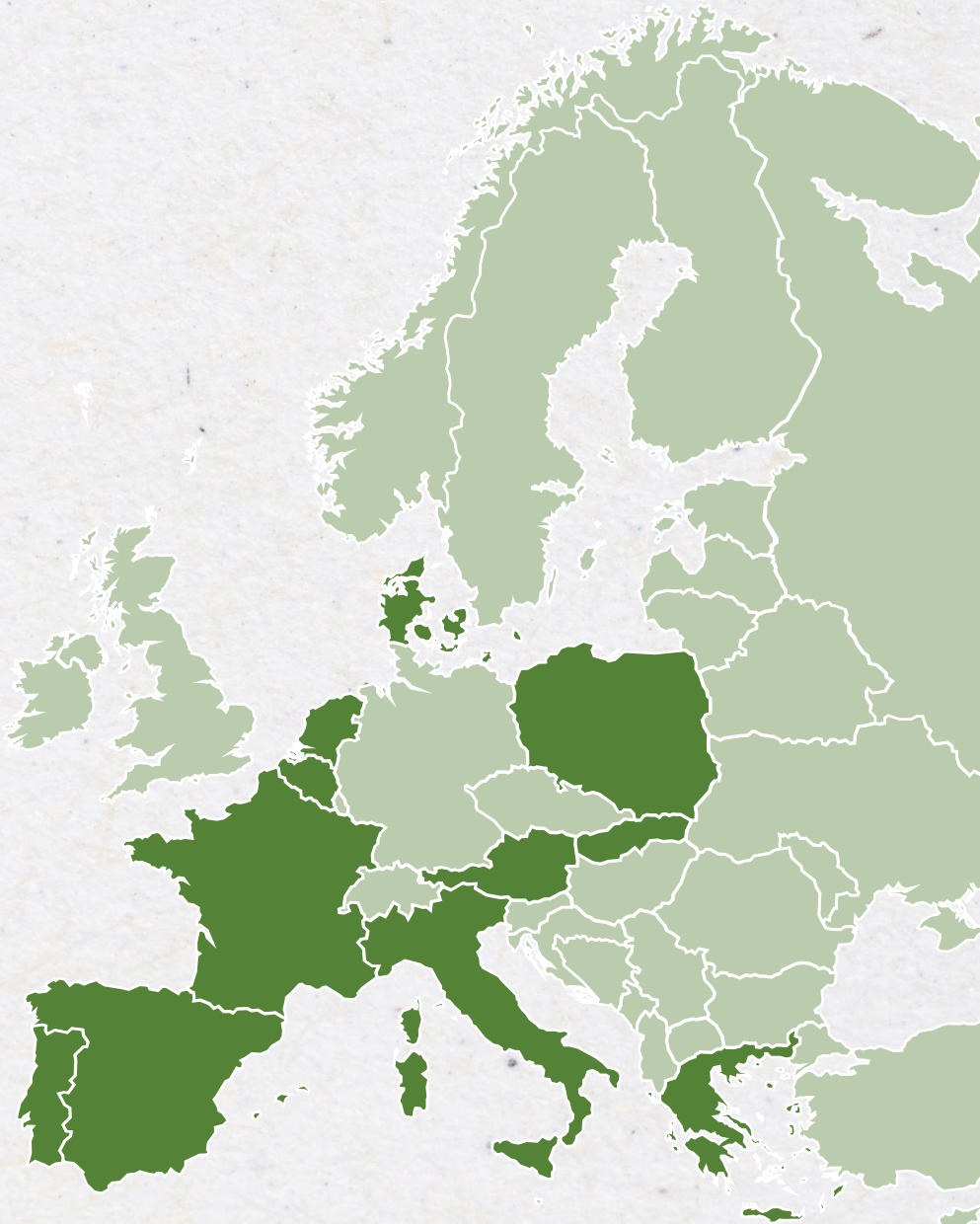


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Tackling greenwashing in the energy sector

Consumers are worried about the significant consequences of climate change and increasingly want to take action to live more sustainably. According to a 2023 BEUC consumer survey,¹ four out of five respondents reported making efforts to reduce their environmental footprint, including in relation to energy consumption, and are paying closer attention to environmental claims. As a result, energy providers are increasingly using green marketing, including on their commercial websites, to influence consumer choices. As a highly polluting sector, energy providers must exercise caution when making sustainability claims. Their activities continue to have a substantial negative impact on the environment, as they remain heavily reliant on fossil fuels, which are the largest source of greenhouse gas emissions and a major contributor to climate change.²

Research has highlighted that to keep global warming below 1.5°C, a joined effort from all stakeholders is essential to move quickly and permanently away from oil, coal, and gas and towards cleaner energy.³ Today, nearly three-quarters of global greenhouse gas emissions originate from the extraction and combustion of fossil fuels, while residential electricity and heating alone account for 10.9% of emissions.⁴ Yet many energy providers continue to promote their green credentials, while at the same time investing substantial amounts in fossil fuel extraction, combustion and sales. Such practices directly contradict global climate goals and the urgent need to accelerate the transition away from fossil fuels, as set out in COP 28 and the International Energy Agency's Net Zero Roadmap. They also risk locking households and governments into costly gas

infrastructure, undermining efforts to build a more affordable, secure, and independent energy system.

Misleading green claims make it hard for consumers to tell which energy providers are genuinely transitioning away from fossil fuels and those that are not or are doing so at an insufficient pace. This lack of clarity undermines households' ability to make informed choices and risks discouraging consumers from switching to electrified and renewable solutions, such as heat pumps or solar panels. Ultimately, misleading environmental claims delay the transition to energy options that are more sustainable and affordable for consumers.

Emissions from oil and gas production must be reduced to zero by 2040, with no new investment in fossil fuel supply and a sustained decline in oil and gas production. Renewable energy is central to this transition, with global capacity needing to triple by 2030 and become the main source of energy by the middle of the century, alongside a doubling of energy efficiency improvements. Moreover, the electrification of end uses is a major strategic lever for energy security, affordability and decarbonisation, as electricity enables a much more efficient delivery of energy services compared with conventional fossil fuel technologies.⁵ This requires a rapid uptake of battery-electric vehicles in transport, heat pumps in the residential sector, and rooftop solar installations where feasible, combined with energy efficiency improvements. Together, these solutions enable consumers to reduce both their emissions and energy bills, while strengthening Europe's energy security in tense geopolitical times.⁶

¹ BEUC, 'The Great Green Maze – Survey Results from 16 countries' (2023) <https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-149_The_Great_Green_Maze_How_environmental_advertising_confuses_consumers.pdf>

² International Energy Agency, 'Net Zero Roadmap: A Global Pathway to Keep the 1.5°C Goal in Reach' (2023 update) 20; Climate watch, 'Historical GHG Emissions' (*Climate watch*) <<https://www.climatewatchdata.org/ghg-emissions>>; This statistic is aligned with numbers reported in IPCC, 'Climate Change 2023: Synthesis Report' (6th Assessment Report, 2023) 44.

³ United Nations, 'COP28 signals beginning of the end of the fossil fuel era' (*United Nations*) <<https://www.un.org/en/climatechange/cop28>>; International Energy Agency, 'Net Zero Roadmap: A Global Pathway to Keep the 1.5°C Goal in Reach' (2023 update) <<https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-c-goal-in-reach>>

⁴ Hannah Ritchie, 'Sector by sector: where do global greenhouse gas emissions come from?' (*Our world in data*, 18 September 2020) <<https://ourworldindata.org/ghg-emissions-by-sector>>.

⁵ European Commission, *AccelerateEU – Energy Union: affordable and secure energy through accelerated action* (2026).

⁶ BEUC, How to protect consumers in (yet) another fossil fuel crisis, April 2026 (www.beuc.eu/sites/default/files/publications/BEUC-X-2026-027_How_to_protect_consumers_in_another_fossil_fuel_crisis.pdf).

Methodology and targeted traders

During March 2025 and May 2026, consumer groups gathered environmental claims made by **TotalEnergies, ENGIE, Eni Plenitude, and Shell** directly on their commercial websites⁷ where consumers can sign up for electricity or gas contracts or buy heating oil. In some instances, those companies⁸ include links on their commercial websites (e.g. in sections such as “why choose us” or “discover us”) that redirect consumers to the corporate website, where the environmental claims are made.

TotalEnergies, ENGIE, Eni Plenitude, and Shell are all operating or marketing their products in several European countries by relying on what we believe

are misleading green claims ([Annex I](#)). However, the problem is also systemic and a sector-wide one. In (non-exhaustive) research, consumer groups found similar environmental claims made by energy providers operating at domestic level (see [Annex II](#)).

To further support our research, we commissioned a study from KU Leuven⁹ assessing the legality of environmental claims made by energy providers against the requirements laid down in EU Directive 2005/29/EC prohibiting unfair commercial practices (the UCPD), and EU Directive 2024/825 (the Empowering Consumers for the Green Transition Directive).

Identified misleading environmental claims

This report identifies several categories of environmental claims made by energy providers:¹⁰



Generic environmental claims are claims through which energy providers promote their green credentials. For example, ENGIE claims that it *helps customers achieve their sustainability goals*¹¹ or that it *provides efficient and sustainable energy solutions*¹², even though fossil gas remains part of such solutions and consumers can be nudged to sign up for a gas contract through this messaging. Companies also use generic claims when marketing their products under generic green terms, such as a ‘green energy,’ ‘sustainable energy’ or ‘eco’. This is notably the case of *Shell Heating Oil Eco*¹³

or *TotalEnergies Bio Premium thermogreen oil*¹⁴. Similar examples can be found from energy providers operating in domestic markets. It includes, for example: *Eco-tariffs for natural gas*¹⁵ by Octa+ (Belgium), *Premium heating oil is good for both your wallet and the environment*¹⁶ by Circle K (Denmark), *Eco heat gas*¹⁷ by Heron (Greece), *environmentally friendly gas*¹⁸ by Protergia (Greece), or *Why contracting light and gas with Naturgy? Quietness of taking care of the planet*¹⁹ by Naturgy (Spain).

⁷ [Annex I](#) provides the links to the commercial websites and screenshots of environmental claims made by ENGIE, TotalEnergies, Eni Plenitude and Shell.

⁸ This is for example the case of TotalEnergies (France), ENGIE (France) in and Eni Plenitude (France and Italy). See links provided in [Annex I](#).

⁹ “Misleading Environmental Claims in the EU Energy Sector: Legal Assessment under the Unfair Commercial Practices Directive and the Empowering Consumers Directive” by Pr. Alberto De Franchesi, Pr. Evelyne Terryn, Pr. Bert Keirsbilck with research assistance by Christopher Borucki, Amelies De Grave, Liesbet Van Acker, Elias Van Gool (KU Leuven) published in June 2026.

¹⁰ See [Annex I](#) for a full overview of environmentally claims made by ENGIE, TotalEnergies, Eni Plenitude and Shell, including links and screenshots. See [Annex II](#) for an overview of environmental claims made by energy providers in domestic markets, including links and screenshots.

¹¹ <https://www.engie.be/fr/transition-energetique/> (accessed on 18/05/2026).

¹² <https://corporate.engie.be/fr/solutions-clients> (accessed on 18/05/2026).

¹³ <https://hauswaerme.shell.de/produkte/heizoel-eco.html> (accessed on 18/05/2026).

¹⁴ <https://energishop.totalenergies.de/> (accessed on 18/05/2026).

¹⁵ <https://www.octaplus.be/nl/particulieren/elektriciteit-aardgas> (accessed on 18/05/2026).

¹⁶ <https://bestilfyringsolie.dk/> (accessed on 18/05/2026).

¹⁷ <https://heron.gr/ecoheat/> (accessed on 18/05/2026).

¹⁸ <https://www.protergia.gr/spiti/fysiko-aerio-gia-spiti/pliories-gia-fysiko-aerio/> (accessed on 18/05/2026).

¹⁹ <https://www.naturgy.es/hogar> (accessed on 18/05/2026).



Carbon offset-based claims are claims where energy providers argue that CO₂ emissions associated with gas are fully or partly compensated or counterbalanced through offset credits or investments in climate-related projects elsewhere (e.g. forest plantations). This is for instance the case

of ENGIE in the Netherlands when marketing CO₂-compensated gas²⁰. Examples of national energy providers making such claims are MEGA²¹ and Octa²² (Belgium), AVG²³ and Lekker²⁴ (Germany) ANWB²⁵ (the Netherlands), Pepe Energy²⁶ (Spain), Yoigo²⁷ (Spain) or SPP²⁸ (Slovakia).



Environmental claims based on limited sustainability aspects of a product or business

are claims through which energy providers highlight specific aspects of their activities in relation to renewable energy, despite the fact that these activities represent only a small share of their overall operations, or while the company continues to largely depend on fossil fuels. This is the case for ENGIE, TotalEnergies and Eni Plenitude. While the companies have invested in the development of renewable energy, they continue to heavily rely on the sales of fossil fuels. This type of 'halo' claim can also apply to the offer of combined energy packages of electricity and fossil gas marketed as 'green' or 'sustainable,' such as done by ENGIE in Belgium²⁹, the Netherlands³⁰ and Italy³¹. Our research also identified examples of similar claims

from national providers such as 'green energy' electricity and gas package³² from VSE (Slovakia) or Gold Energy³³ (Portugal). Environmental claims about 'green gas tariffs' when a small share of green gas are also 'halo' claims which convey a misleading impression to the consumer about the positive impact on the environment of this choice, despite remaining a highly polluting product for the environment. For example, TotalEnergies uses the so-called *Fixed Green Offer*³⁴, which contains 10% of biogas and 90% of fossil gas. ENGIE makes the same claim through its *Green Gas Option+* in France³⁵ or *Mix with Green Gas* in the Netherlands³⁶. The use of green terminology for branding fossil fuel products, such as by Shell Heating Oil Eco and Bio Premium thermogreen oil from Total, can also be viewed as an 'halo' claim.

²⁰ <https://www.engie.nl/energie/co2-gecompenseerd-gas> (accessed on 18/05/2026).

²¹ <https://www.mega.be/fr/energie/l-offre-mega/compensation-carbone/compensation-carbone> (accessed on 18/05/2026).

²² <https://www.octaplus.be/nl/graine-de-vie> (accessed on 18/05/2026).

²³ <https://www.stwab.de/Energie-Wasser/Erdgas-und-Erdgas-mit-Klimabeitrag/> (accessed on 18/05/2026).

²⁴ <https://www.lekker.de/fuer-zuhause/gas/gastarife> (accessed on 18/05/2026).

²⁵ <https://www.anwb.nl/energie/hoe-groen-is-groene-energie-stroom> (accessed on 18/05/2026).

²⁶ <https://www.pepeenergy.com/compensacion-huella-carbono> (accessed on 18/05/2026).

²⁷ <https://www.yoigoluzygaz.com/compensacion-huella-carbono> (accessed on 18/05/2026).

²⁸ <https://www.spp.sk/domacnosti/produkty-a-sluzby/uhlikova-stopka/> (accessed on 18/05/2026).

²⁹ www.engie.be/fr/transition-energetique/ (accessed on 18/05/2026).

³⁰ www.engie.nl/verduurzamen/duurzame-energiebronnen (accessed on 18/05/2026).

³¹ www.engie.it/casa/offerte-luce-gas/energia-puntofisso-12mesi/ (accessed on 18/05/2026).

³² www.vse.sk/produkty-a-sluzby (accessed on 18/05/2026).

³³ <https://goldenergy.pt/> (accessed on 18/05/2026).

³⁴ www.totalenergies.fr/particuliers/electricite-et-gaz/offres-d-electricite-et-gaz (accessed on 18/05/2026).

³⁵ <https://particuliers.engie.fr/electricite-gaz/options-gaz-vert-plus.html> (accessed on 18/05/2026).

³⁶ www.engie.nl/energie/mix-met-groen-gas (accessed on 18/05/2026).



Claims on future environmental performance, notably with respect to moving to net-zero emissions or climate neutrality targets pledged by companies which continue to invest in the extraction and sales of fossil fuels. This is the case

of TotalEnergies (in Belgium³⁷, Germany³⁸ and France³⁹) ENGIE (in France⁴⁰, Belgium⁴¹ and the Netherlands⁴²), Shell (Germany⁴³) and Eni Plenitude (Italy and France⁴⁴, as well as Greece⁴⁵).



Source: <https://particuliers.engie.fr/engie-act.html> (consulted 18/02/25, 03/04/2025, 14/10/2025; 17/03/2026; 28/04/2026; 28/05/2026). English text with automatic translation: 'The ENGIE Group aims for Net Zero Carbon. Discover the major actions of ENGIE Group on a global scale to accelerate the energy transition. Our major commitments: Net Zero Carbon by 2035; 80GW of electricity production capacity installed in renewables in 2030; our strategy is consistent with a warming "well below 2°C" (Scientific-Based Targets certification).'



Comparative claims are claims where traders depict gas as "clean," "sustainable," or suitable as a "transition" fuel or have "reduced CO2 emissions compared to other fossil fuels". This is the case of TotalEnergies advertising gas as "an ecological and advantageous source of energy⁴⁶," less polluting than oil or coal. These claims suggest that gas-based heating can be a climate-responsible source of energy and can discourage consumers from shifting to electrified and renewable alternatives

such as heat pumps and solar energy. We also found examples of misleading claims about natural gas made by energy providers operating in domestic markets such as Dansk Energiforsyning ("the burning of natural gas emits significantly less CO2 than other types of fossil fuels. It is therefore the most environmentally friendly among fossil fuels"⁴⁷ and Nettopower ("natural gas is a type of fossil fuel that stands out in particular by being more environmentally friendly than other traditional

³⁷ <https://totalenergies.be/fr/particuliers/blog/lactu/championne-du-monde-de-lenergie-solaire> (accessed on 18/05/2026).

³⁸ <https://totalenergies.de/ueber-uns/ambition>

³⁹ The section "discover us" of TotalEnergies website, through the text "découvrez les ambitions de la Compagnie TotalEnergies pour une énergie meilleure" (<https://www.totalenergies.fr/nous-decouvrir>, accessed on 18/05/2026) redirects consumers to the corporate website where the company continues to advertise its climate neutrality commitments for 2050. <https://totalenergies.com/fr/compagnie/demarche> (accessed on 18/05/2026).

⁴⁰ www.engie.nl/over-ons (accessed on 18/05/2026).

⁴¹ www.engie.be/fr/transition-energetique/ (accessed on 18/05/2026).

⁴² www.engie.nl/over-ons (accessed on 18/05/2026).

⁴³ <https://hauswaerme.shell.de/produkte/heizoel-eco.html> (accessed on 18/05/2026).

⁴⁴ Claim made in Eni Plenitude corporate website (<https://corporate.eniplenitude.com/it/chi-siamo/la-nostra-identita>, accessed on 18/05/2026), reachable through the section "Discover Plenitude" of the Italian commercial website (<https://eniplenitude.com/contatti>, accessed on 18/05/2026). Similarly, the commercial website of Eni Plenitude in France invites consumers to discover more about the company through a link (www.eniplenitude.fr/decouvrez-plenitude, accessed on 18/05/2026) that reaches the corporate website (<https://corporate.eniplenitude.com/it/chi-siamo/la-nostra-identita>, accessed on 18/05/2026).

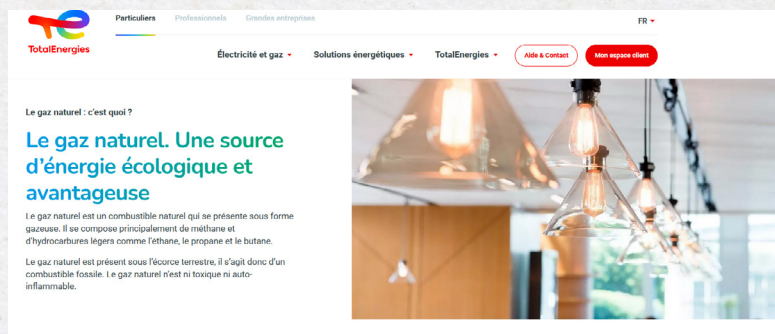
⁴⁵ <https://zenith.gr/el/company/ta-proionta-ilektrikis-energeias-tis-zenith-eginan-prasina/> (accessed on 18/05/2026).

⁴⁶ <https://totalenergies.be/fr/particuliers/produits-et-services/my-home/electricite-et-gaz/notre-energie-durable/gaz-naturel> (accessed on 18/05/2026).

⁴⁷ <https://danskenergiforsyning.com/gas/> (accessed on 18/05/2026).

fossil fuels such as coal and oil”⁴⁸) in Denmark, Audax Renovables (“natural gas stands out for its reduced environmental impact compared to other

energy sources available on the market”⁴⁹) in Spain or Orlen in Poland with “the main advantages of natural gas are: reduced emissions⁵⁰” .



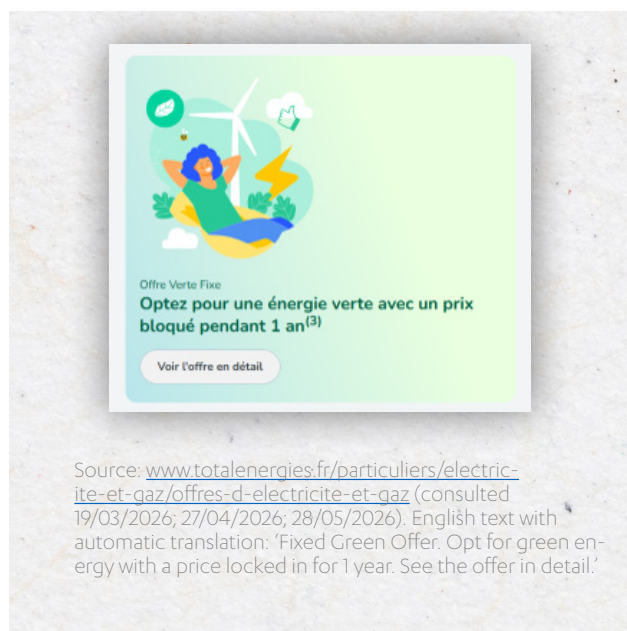
Source: <https://totalenergies.be/fr/particuliers/produits-et-services/my-home/electricite-et-gaz/notre-energie-durable/gaz-naturel> (consulted 18/03/2026; 27/04/2026; 28/05/2026). English text with automatic translation: 'What is natural gas? Natural gas. An ecological and advantageous source of energy.'

Importantly, the above categories **should not be seen as mutually exclusive**, and environmental claims may also often combine different features.

In addition, energy providers make implicit green claims in their commercial websites. Environmental claims are frequently presented alongside “**green**” **visual imagery**, including the extensive use of green colour schemes, trees, wind turbines, or planet symbols. This is for instance the case of TotalEnergies marketing its *Green Fixed Offer* with green colours and images of nature and wind turbines, as well as natural gas with a picture of a forest. Considering the high environmental impact of fossil fuel energy companies, the use of such green imagery by these operators is particularly likely to mislead consumers.

The details of climate-related marketing claims by energy providers may differ. However overall, they build on a **common narrative highlighting how energy providers are committed to support the energy transition and climate neutrality goals, despite their significant and long-lasting reliance**

on heavily polluting fossil fuels. Additionally, through their environmental claims, energy providers nudge consumers towards purchasing fossil-fuel based products as ‘climate-responsible’ heating solutions.



Source: www.totalenergies.fr/particuliers/electricite-et-gaz/offres-d-electricite-et-gaz (consulted 19/03/2026; 27/04/2026; 28/05/2026). English text with automatic translation: 'Fixed Green Offer. Opt for green energy with a price locked in for 1 year. See the offer in detail.'

⁴⁸ www.nettopower.dk/naturgas/ (accessed on 18/05/2026).

⁴⁹ www.audaxrenovables.es/es/gas/ (accessed on 18/05/2026).

⁵⁰ <https://myorlen.pl/czym-jest-gaz-ziemny> (accessed on 18/05/2026).

The relevant EU regulatory framework: EU Directive 2005/29/EC on businesses-to-consumers unfair commercial practices

Art. 6 of EU Directive 2005/29/EC (the Unfair Commercial Practices Directive - UCPD) prohibits misleading actions. Commercial practices are prohibited if they fulfill three criteria, namely:

1. They contain false information and are therefore untruthful or in any way, including overall presentation, deceive or are likely to deceive the average consumer, even if the information is factually correct,
2. They relate to characteristics of the promoted product or of the trader that are listed in Article 6(1) UCPD, which includes “the existence or nature of the product” and the “main characteristics of the product”, and
3. They cause or are likely to cause [consumers] to take a transactional decision that they would not have taken otherwise.”

Art. 7 UCPD prohibits misleading omissions. Commercial practices are prohibited if they fulfill two criteria:

1. They omit material information that the average consumer needs, according to the context, to take an informed transactional decision. Whether this is the case must be established within the broader factual context of the commercial practice, taking account of all its features and circumstances and the limitations of the communication medium.
2. The omission causes or is likely to cause the average consumer to take a transactional decision that he would not have taken otherwise.” According to Article 7(2) UCPD, a trader misleads through omission if material information is provided in an unclear, unintelligible, ambiguous or untimely manner.

Art. 12 UCPD provides that traders must have the evidence to support their claims. Therefore, the burden of proof rests with traders.

The Empowering Consumers for the Green Transition (ECGT) Directive (EU Directive 2024/825) strengthens consumer protection against misleading environmental claims. It prohibits, subject to the transactional decision test⁵¹:

- Claims on future environmental performance (new Article 6(2)(d)UCPD) which are not based on clear, objective, publicly available and verifiable commitments, set out in a detailed implementation with measurable, time-bound targets and adequate resources.

It also prohibits in all circumstances:

- Generic environmental claims (Annex I, point 4a).
- Carbon offset claims on products (Annex I, point 4c)
- ‘Halo’ claims or claims that highlight a limited positive environmental attribute in a way that creates a broader, unjustified impression of overall environmental sustainability (Annex I, point 4b).
- Claims that present legal requirements as a distinctive feature of the trader’s offer (Annex I, point 10a).

It should be noted that the ECGTD does not displace the general prohibition of misleading practices under Art. 6 and 7 UCPD. To a large extent, it reflects and codifies existing enforcement practice and interpretations developed under the UCPD, thereby facilitating its enforcement in greenwashing cases. As further detailed in the study accompanying the alert, the UCPD Guidance, as well as national guidance, national case law and enforcement practice, recognise that companies operating in highly polluting sectors, such as the fossil fuel energy sector, **are subject to higher standards** when making environmental claims, including with respect to ‘green imagery’.⁵²

⁵¹ Traders proposing consumer-facing products must comply with the ECGTD by 27 September 2026.

⁵² See [Study KU Leuven](#), p. 23-26.

Application to the identified claims

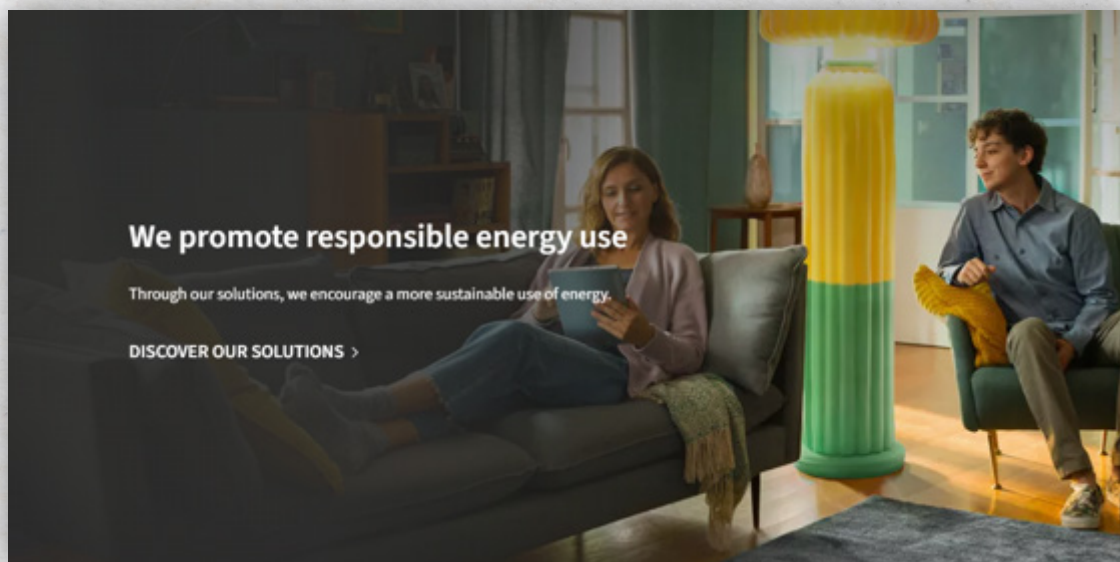
The study accompanying this alert provides an in-depth analysis of how the five different categories of most common and harmful environmental claims in the energy sector breach consumer protection legislation.⁵³ We highlight here the following aspects:

First, generic environmental claims - such as “sustainable energy solutions,” “a world leader in the energy transition,” “we make sustainability an Italian excellence” - tend to convey an impression of excellent environmental performance. Yet they remain vague and ambiguous, and therefore particularly prone to over-generalisation. These shortcomings are especially problematic in highly polluting sectors, where stricter standards apply given the significant environmental impact involved.

Claims that link generic environmental benefits with fossil fuel businesses or highly-polluting fossil fuel products are false and particularly misleading.⁵⁴ Fossil fuels, including gas, are a **major driver** of greenhouse

gas emissions. Gas combustion generates substantial CO₂ emissions, and when considering the full life cycle methane leakage during extraction and transport can result in climate impacts comparable to or worse than those of oil and coal.⁵⁵ These concerns are further exacerbated when the claim is supported by the use of green imagery in its presentation, as outlined above.

Claims arguing that energy providers which are promoting the use of fossil fuels can be “sustainable,” or “leaders of the energy transition” are deceptive. The energy sector is responsible for a significant amount of GHG emissions and the continued investment and sale of fossil fuels, including gas, are incompatible with the Paris Agreement. The use of generic claims greening the image of energy providers or giving a false impression on the environmental benefits of fossil-fuel based products obscures the fact that the only effective strategy to decarbonise the energy sector is to accelerate the shift to renewable energy and electrified solutions such as heat pumps.



Source: <https://corporate.eniplenitude.com/it/home-page?prov=c> accessible through the commercial website <https://eniplenitude.com/contatti> (consulted 26/03/2026; 28/05/2026).

⁵³ See [Study KU Leuven](#), Chapter 4.

⁵⁴ See [Study KU Leuven](#), p. 30.

⁵⁵ See [Study KU Leuven](#), chapter 2.2.

Second, claims arguing that carbon credits can fully or partly offset, neutralise or compensate elsewhere the CO₂ emissions of fossil fuel products, such as gas are factually incorrect. They have already been successfully contested under the general rules on misleading actions and omissions of UCPD,⁵⁶ and are explicitly prohibited by the ECGT Directive. The marketing of fossil fuel products as “carbon neutral” or “CO₂ compensated,” where this claim is based on the purchase of carbon credits, constitutes an unfair commercial practice in all circumstances under the ECGT Directive. As noted in the preamble to this Directive, there is a false equivalence between actual greenhouse gas emissions and offsets. The climate benefits attributed to offsetting activities are far less

certain than the well-established and long-lasting climate harm caused by the CO₂ emissions of fossil fuel products, including gas.

Offsetting credits are subject to significant scientific and technical limitations (e.g. lack of additionality, emissions leakage, non-permanence and double counting). Moreover, the system of carbon credits and offsetting is poorly understood by consumers, as demonstrated by several studies carried out by consumer organisations⁵⁷. In particular, many consumers understand offsetting claims as implying a direct reduction in emissions, or even the absence of emissions altogether.



Source: www.engie.nl/energie/co2-gecompenseerd-gas (consulted 21/03/2025; 18/03/2026)
English text with automatic translation: “CO2-compensated gas.”

Third, fossil-fuel companies are increasingly rebranding themselves as energy companies committed to renewables. Yet their core business model remains the expansion of fossil fuel extraction and sales, in direct contradiction with the Paris climate goals. While promoting limited “green” initiatives, their brand advertising continues to drive demand for fossil fuel products. When a predominantly fossil-fuel based energy supplier draws attention solely to its renewable energy activities, the average consumer may be led to believe that the company as a whole, and all of its products, are sustainable, particularly when such messaging is combined with generic environmental claims and green imagery, which can suggest that the low-carbon activities apply to the company as a whole. Such ‘halo’ claims can exaggerate the relevance of lower-carbon energy products within the supplier’s overall activities. Where this contextual information is omitted, the practice may amount to a misleading omission.⁵⁸

Emphasising small sustainability benefits of a product - which has an overall negative environmental impact - can also be misleading. For example, highlighting the inclusion of a limited share of biogas in an otherwise fossil gas contract may lead consumers to overestimate the product’s actual environmental performance. The use of the absolute term ‘green’ (apart from being a problematic generic environmental claim) can give the impression that the overall impact of the gas package is positive for the environment while it remains a highly polluting product. Moreover, some EU Member States have blending obligations to meet renewable energy targets; in these cases, the company might mislead consumers by presenting mandatory requirements set by laws as distinctive aspects of the product. It should be noted that consumers pay a premium for these gas packages.

⁵⁶ See [Study KU Leuven](#), p. 38-41.

⁵⁷ Zühlsdorf, A., Kühl, S., Radda, D. and Spiller, A. (2023). *Green advertising claims on food products: Consumer study on the understanding of environmental and climate-related advertising claims*. Summary report of the scientific accompanying research for the project *Lebensmittelklarheit*, commissioned by the Verbraucherzentrale Bundesverband e. V. (vzbv). Göttingen. Available at: www.vzbv.de/sites/default/files/2023-02/23-02_24_Gruene-Marketingclaims-auf-Lebensmitteln.pdf; BEUC, ‘The Great Green Maze – Survey Results from 16 countries’ (2023) <https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-149_The_Great_Green_Maze_How_environmental_advertising_confuses_consumers.pdf>.

⁵⁸ See [Study KU Leuven](#), page 45, particularly ASA on *Shell* and *TotalEnergies*.

ENGIE Ihr fournisseur d'électricité vert et gaz naturel > Option Gaz Vert

Option Gaz vert+ : ENGIE votre fournisseur de gaz vert français

Un objectif commun : favoriser le développement des énergies renouvelables en France
A partir de **0,75€ TTC / mois**

[Je souscris](#)

Soutenez la filière des sites de production exclusivement installés en France

- Gaz renouvelable
- Production française
- Zero engagement

Rappel gratuit et immédiat par un conseiller options vertes
[Demander mon numéro](#)

Source: <https://particuliers.engie.fr/electricite-gaz/options-gaz-vert-plus.html>

(consulted 28/04/2026) English text with automatic translation: 'Green Gas Option+: ENGIE Your French green gas supplier. A common objective: to promote the development of renewable energies in France. From €0.75/month: I subscribe. Support the supply chain of production sites exclusively located in France. Renewable gas. French production. Zero commitment.'

A similar analysis with respect to the misleading nature of 'halo' claims applies to heating oil marketed with green terms (e.g. ECO, bio, thermogreen) and which is also more expensive.

Shell Homepage Produkte News & Tipps Shell Partner finden Forschung & Entwicklung

Homepage > Produkte > Shell Heizöl Eco

Shell Heizöl Eco – Unser Premium-Heizöl

Shell Heizöl Eco zeichnet sich durch seine hohe Qualität aus. Es wurde entwickelt, um den Energieverbrauch zu optimieren und gleichzeitig den CO₂-Ausstoß zu reduzieren. Durch seinen hohen Brennwert sorgt es für eine effektive Wärmeabgabe und ermöglicht somit ein angenehmes Raumklima.

[Produkte der Shell Partner](#)

Source: <https://hauswaerme.shell.de/produkte/heizoel-eco.html> (consulted 04/05/2026). English text with automatic translation: 'Shell Heating Oil Eco – Our premium heating oil [...] It has been developed to optimise energy consumption and at the same time reduce CO2 emissions.'

Heizöl Pellets AdBlue® ClearNOx®

Empfohlen		
<p>Premium thermoplus</p> <p>129,72 €</p> <p>Preis für 100 Liter inkl. MwSt.</p> <ul style="list-style-type: none"> ✓ Erfüllt die DIN 51603-1 ✓ Saubere Verbrennung mit minimalen Rückständen ✓ Angereichert mit Additiven für bessere Qualität ✓ Längere Lagerfähigkeit durch spezielle Formel ✓ Schutz der Ölheizung durch reinigende und antikorrosive Additive ✓ Angenehmer, dezenter Geruch ✓ Schnelle Lieferung ✓ Premiumqualität 	<p>Bio Premium thermogreen</p> <p>146,38 €</p> <p>Preis für 100 Liter inkl. MwSt.</p> <ul style="list-style-type: none"> ✓ Konstante Leistung durch spezielle Zusätze, die die Ölqualität stabil halten und die Lebensdauer der Ölheizung erhöhen ✓ Schnelle Lieferung ✓ Lagerung in Kunststoff- und Stahltanks ✓ Nachhaltig: Mindestens 10 % Bioanteil aus nachwachsenden Rohstoffen ✓ Höhere Lagerfähigkeit ✓ Vielseitig einsetzbar: Für Einstrangversorgung und konventionelle Anlagen geeignet ✓ Premiumqualität gem. DIN 51603-6 EL A Bio10 	<p>Heizöl schwefelarm</p> <p>127,34 €</p> <p>Preis für 100 Liter inkl. MwSt.</p> <ul style="list-style-type: none"> ✓ Schnelle Lieferung ✓ Schwefelarm bei einem geringen Schwefelgehalt (max. 0,005 %) ✓ Kontrollierte Standardqualität gem. DIN 51603-1

Source: <https://energieshop.totalenergies.de/> (consulted 04/05/2026). English text with automatic translation: 'Heating oil [...] Bio Premium thermogreen [...] Sustainable: at least 10% organic from renewable raw materials.'

Similarly, this type of misleading claim can be found on electricity and gas packages which are sold to consumers under the headline of **“100% Green Energy”**. While within the offer’s description it can be seen that the package comprises 100% green

electricity, the reality is that it also includes fossil gas, which makes the overall presentation of the package as “green” misleading. Such claims are not only inaccurate but also exaggerate the overall environmental benefits of the package.

The screenshot shows a webpage for 'Energia PuntoFisso 12 Mesi' by ENGIE. The main headline is 'E in più, sempre inclusi nella tua offerta:'. Below this, there are five bullet points describing benefits: digital convenience, 100% green energy, support for every need, consumption monitoring, and the ENGIE app. To the right, there is a summary box for 'Luce e Gas' with 'Solo Luce' and 'Solo Gas' options. It lists 'Energia PuntoFisso 12 Mesi' with a validity until 06/05/2026. It shows 'Luce' with a 'Mistone' tariff and 'Gas' with a 'Mistone' tariff. Annual costs are listed as 77 € for electricity and 84 € for gas. A 'Simula la tua bolletta' button is at the bottom.

Source: www.engie.it/casa/offerte-luce-gas/energia-puntofisso-12mesi/ (consulted 04/05/2026). English text with automatic translation: ‘And what’s more, always included in your offer: [...] Green Energy at no extra cost. With ENGIE, 100% electricity comes from renewable sources. It’s good for you, and even more so for the planet (in smaller size font) [...]’

The screenshot shows a webpage for 'Duurzame energie van ENGIE'. The headline is 'Duurzame energie van ENGIE'. Below this, there is a paragraph in Dutch: 'Ben je van plan om over te stappen naar duurzame energie? Dan ben je bij ENGIE aan het juiste adres. We helpen je graag om te verduurzamen en te besparen.' This is followed by a list of bullet points in Dutch: 'Voordelige energieprijzen', 'Standaard 100% groene stroom en Mix met groen gas', 'Gratis slimme meter app waarmee je kunt besparen op je energieverbruik', 'Een eigen persoonlijke omgeving om goed overzicht te houden', and 'Hulp bij het verduurzamen van je huis via persoonlijk advies of een energiescan'. A 'Bereken direct je maandbedrag' button is at the bottom. The background image shows a couple riding bicycles on a path with wind turbines in the distance.

Source: www.engie.nl/verduurzamen/duurzame-energiebronnen (consulted 18/03/2026; 27/04/2026). English text with automatic translation: ‘Sustainable energy from ENGIE. Are you planning to switch to sustainable energy? Then you’ve come to the right place at ENGIE. We are happy to help you become more sustainable and save. [...] (In smaller fonts): Advantageous energy prices. Standard 100% green electricity and Mix with green gas. Free smart meter app that allows you to save on your energy consumption. Your personal own environment to keep a good overview. Help with making your home more sustainable through personal advice or an energy scan.’

Four, claims about future environmental performance without clear definitions and evidence, are prone to vagueness and misinterpretation by consumers. Such claims have been subject to increasing scrutiny and challenge in recent years under the general rules of the UCPD. Courts in Paris, Amsterdam and Nuremberg-Fürth have found that claims relating to future carbon-neutrality or zero-CO₂ targets were misleading in the *TotalEnergies*, *KLM* and *Adidas* cases.⁵⁹

Claims about future environmental performance must be based on objective, publicly available and verifiable commitments, supported by credible transition plans. However, **the mere existence of a transition plan is not sufficient**: it must be substantiated against scientific evidence. For climate-neutral or net-zero claims, this requires alignment with the Paris Agreement. Therefore, where energy providers fail to phase out fossil fuels at the pace required to stay below 1.5°C, or continue expanding fossil fuel investments, they mislead consumers when claiming their climate neutrality goals.

As highlighted by authors of the study supporting this research, the French court concluded that TotalEnergies failed to demonstrate its net-zero emission goal because its expansion of fossil fuel production is inconsistent with scientific recommendations on reaching carbon neutrality by 2050. For consumers, judging the credibility of such 'greenwashing' is near impossible, as it requires

technical insight into the company's climate mitigation strategy, operations and investments. However, as highlighted by the French court in the *TotalEnergies* case, the concept of climate neutrality is understood by consumers in the context it is used under the Paris Agreement. It cannot be expected that the average consumer will understand that companies can deviate from 'consensus' definitions substantiated by climate science.⁶⁰

Moreover, net-zero claims by fossil fuel companies can be misleading where they exclude the emissions of the fossil-fuel products sold by the company (so-called 'scope 3 emissions') or only partly include them (e.g. as done by TotalEnergies and ENGIE respectively), even though they represent the vast majority of the company's carbon footprint.

The French court ordered TotalEnergies to withdraw its net-zero target claim as well as "being a major actor of the green transition" from its commercial website in **France, along with other measures such as publishing the court decision on the website for 180 days**. During our evidence-gathering, we observed that TotalEnergies carbon neutrality claim remains accessible through the section "about us" of the French commercial website, which leads consumers (via the link "discover the ambitions of the company TotalEnergies for a better energy") to the corporate website where the claim continues to appear.



L'ambition de TotalEnergies en matière de développement durable et de transition énergétique vers la neutralité carbone, ensemble avec la société

TotalEnergies réaffirme son ambition d'atteindre la neutralité carbone, ensemble avec la société, au service de laquelle elle poursuit, avec constance, sa stratégie de transition équilibrée et créatrice de valeur, fondée sur deux piliers : Oil & Gas et Integrated Power.

Source: <https://totalenergies.com/fr/compagnie/demarche> accessible through the commercial website <https://www.totalenergies.fr/nous-decouvrir> (consulted 18/03/2026). English text with automatic translation: *TotalEnergies' ambition in terms of sustainable development and energy transition towards carbon neutrality, together with society. TotalEnergies reaffirms its ambition to achieve carbon neutrality, together with society, in which it consistently pursues its strategy of balanced and value-creating transition, based on two pillars: Oil & Gas and Integrated Power.*

⁵⁹ Tribunal judiciaire de Paris 23 October 2025, *TotalEnergies*, RG n° 22/02955; District Court of Amsterdam, 20 March 2024, *KLM*; LG Nuremberg-Fürth 25 March 2025, 3 HK O 6524/24, *Adidas*

⁶⁰ See Study KU Leuven, p. 51

Claims from TotalEnergies about its climate neutrality targets are also displayed on the Belgian⁶¹ and German⁶² commercial websites.



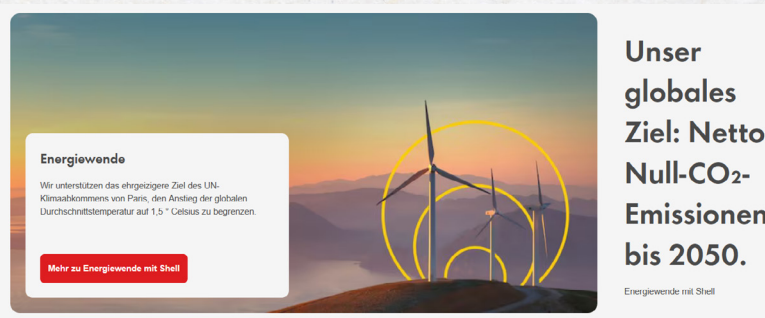
Ce qu'il faut retenir

- TotalEnergies est le leader mondial dans le développement de projets photovoltaïques
- Nous visons les 100 GW de capacité renouvelable en 2030
- Et la neutralité carbone d'ici 2050
- Nous investissons aussi dans le stockage d'énergie et la fabrication de batteries

Source: <https://totalenergies.be/fr/particuliers/blog/lactu/championne-du-monde-de-lenergie-solaire> (consulted 18/03/2026). English text with automatic translation: 'What you need to remember: TotalEnergies is the world leader in the development of photovoltaic projects. We are aiming for 100 GW of renewable capacity by 2030. And carbon neutrality by 2050. We are also investing in energy storage and battery manufacturing.'

ENGIE, Eni Plenitude and Shell, also included in the CPC alert, make climate neutrality claims even though their climate strategies are not aligned with the Paris

Agreement, given continued investments and reliance on fossil fuels and failure to transition away from gas at a pace consistent with limiting warming to 1.5°C.⁶³



Energiewende

Wir unterstützen das ehrgeizigere Ziel des UN-Klimaabkommens von Paris, den Anstieg der globalen Durchschnittstemperatur auf 1,5 ° Celsius zu begrenzen.

Unser globales Ziel: Netto-Null-CO₂-Emissionen bis 2050.

Energiewende mit Shell

Source: <https://hauswaerme.shell.de/> (consulted 19/03/2026). English text with automatic translation: 'Our global goal: net-zero CO₂ emissions by 2050. Energy transition. We support the more ambitious goal of the UN Paris Climate Agreement to limit the increase in the average global temperature to 1.5° Celsius.'

These claims convey to consumers the impression that the companies are meaningfully contributing to the fight against climate change. They tap into consumers' legitimate desire to support businesses that act responsibly on climate matters. By referencing the Paris Agreement or "net zero by 2050", companies benefit from the strong public understanding of these frameworks as global efforts to limit climate harm for present and future generations. As a result, such associations are likely to lead consumers to overestimate the real-world impact of the company's actions, attributing to them a level of climate ambition and effectiveness that goes beyond their actual

contribution.

Fifth, comparative claims about fossil gas overstate its environmental performance and convey the misleading impression that gas is an environmentally-friendly product. Comparisons must include all material emissions and environmental impacts of gas. However, claims such as "Did you know that natural gas emits up to 25 to 30% less CO₂ than petroleum products in its combustion? And 40% to 50% less than coal", as made by TotalEnergies misled consumers by omission. Such claims fail to disclose fossil gas not only emits CO₂ when burned but also that that its

⁶¹ <https://totalenergies.be/fr/particuliers/blog/lactu/championne-du-monde-de-lenergie-solaire> (accessed on 18/05/2026).

⁶² <https://totalenergies.de/ueber-uns/unsere-ambition> (accessed on 18/05/2026).

⁶³ EMBER, Utilities beyond fossil fuels. Evaluating the transition strategies of utility companies – Case study: ENGIE (EMBER, 2021); New Climate Institute (2024) Corporate Climate Responsibility Monitor; Reclaim Finance (2025), ENGIE's 2025 climate plan: status quo on gas; Reclaim Finance (2025), Assessment of ENI's Climate Strategy.; Reclaim Finance (2025), Assessment of ENI's Climate Strategy.; Reclaim Finance (2025), Assessment of Shell's Climate Strategy.

production, transportation, distribution and use can involve methane leakage.⁶⁴ Methane is a highly potent greenhouse gas, and such leaks can have climate impacts comparable to, or even greater than, those associated with the extraction and use of coal and oil.

Moreover, gas remains a highly polluting fossil fuel that emits CO₂ when burned and has a very negative effect on climate change. In addition, comparative claims that focus on reduced pollution by gas, such as “gas is clean”, “it produces virtually no nitrogen oxide, sulfur oxide”, omit significant aspects regarding air pollution. Even if more air pollution would result from a coal

stove, recent studies show harmful levels of indoor air pollution from gas stoves and boilers.⁶⁵

By presenting fossil gas as an environmentally friendly option or “less” polluting to the environment and indoor air, energy providers are misleading consumers and indirectly influencing their availability to opt for electrified solutions such as heat pumps or induction stoves, which deliver clear climate benefits, improve indoor air quality, and reduce exposure to fluctuating energy costs.

Preguntas frecuentes sobre las tarifas de gas de TotalEnergies

¿Es el gas una energía eficiente?

Creemos que la mejor forma de cuidar de ti también es cuidar de nuestro planeta. Por eso apostamos por el uso de energía eficiente, como el gas natural.

El gas natural tiene un alto poder calorífico y bajas emisiones de contaminantes atmosféricos a la hora de su combustión.

¿Sabías que el gas natural emite en su combustión hasta un 25 a 30% menos de CO₂ que los productos derivados del petróleo? ¡Y entre un 40% y un 50% menos de CO₂ que el carbón!

En TotalEnergies trabajamos con las últimas novedades en tecnología para producir energía más eficiente y ayudarte a ahorrar en tu consumo anual de gas y electricidad.

Source: www.totalenergies.es/es/hogares/tarifas-gas/a-tu-aire (consulted 18/03/2026). English text with automatic translation: ‘Frequently asked questions about TotalEnergies gas tariffs. Is gas an efficient energy? We believe that the best way to take care of yourself is also to take care of our planet. That is why we are committed to the use of efficient energy, such as natural gas. Natural gas has a high calorific value and low emissions of atmospheric pollutants when burning. Did you know that natural gas emits up to 25 to 30% less CO₂ than petroleum products when burned? And 40% to 50% less CO₂ than coal! [...]’

Sixth, the Unfair Commercial Practices Directive also covers the use of “green imagery,” including colours, symbols and visual elements that suggest environmental benefits. Such non-verbal elements significantly shape consumer perception and must be assessed as part of a holistic analysis of a commercial practice, as recognised in behavioural research and CJEU case law.

According to the UCPD Guidance, imagery must accurately reflect the scale of any environmental benefit and must not exaggerate it. Case law, including the KLM judgment, confirms that visuals implying

unsubstantiated or overstated benefits are misleading. Given their inherently high environmental impact, fossil fuel energy companies should apply a particularly high standard of care when using green imagery, as it is likely to mislead consumers.⁶⁶

⁶⁴ MIT Climate Portal Writing Team, ‘How much does natural gas contribute to climate change through CO₂ emissions when the fuel is burned, and how much through methane leaks?’ (*Climate Portal*, 17 July 2023) <<https://climate.mit.edu/ask-mit/how-much-does-natural-gas-contribute-climate-change-through-co2-emissions-when-fuel-burned>>; Union of Concerned Scientists, ‘Environmental Impacts of Natural Gas’ (*Union of Concerned Scientists*, 9 May 2023) <<https://www.ucs.org/resources/environmental-impacts-natural-gas>>.

⁶⁵ Carlo Luiu and others, ‘Reducing health risks of gas cooking’ (2025) *WM-Net Zero*, <<https://doi.org/10.25500/pure.bham.258583195>>; Nate Seltenrich, ‘Clearing the Air: Gas Stove Emissions and Direct Health Effects’ (2024) 132(2) *Environ Health Perspect.* 022001; *WM-NET Zero*

⁶⁶ See *Study KU Leuven*, p. 25

