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Legal Regulation of Greenwashing Assessment Parameters in Corporate Sustainability Reports

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Abstract
The practice of greenwashing in corporate sustainability reports presents legal challenges because until now Positive Law in Indonesia has not established clear parameters to determine when sustainability claims are categorized as misleading information. The absence of these parameters creates the problem of legal certainty that has an impact on corporate accountability for investment decisions obtained based on the information submitted in the sustainability report whether it meets legally accountable standards. This study aims to analyze the normative basis in the assessment of greenwashing practices and reconstruct legal parameters to achieve legal certainty in corporate sustainability reporting. Using normative legal research methods that focus on statutory and conceptual approaches, this study shows that positive law in Indonesia has provided a normative basis for corporate sustainability reporting and information disclosure. Current rules are still fragmented and have not distinguished between legitimate sustainability claims and misleading claims. This study proposes legal reconstruction through three assessment parameters such as the threshold of material non-conformity, the methodology of proving the element of intentionality, and the measurable standard that can be audited consistently. These parameters are intended to operationalize the principle of transparency of sustainability information in order to strengthen legal certainty and ensure accountability for corporate sustainability claims in Indonesia.

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Introduction

The dynamics of the capital market world mark a shift in the investment paradigm, where investors are now not only focusing on financial performance. [1] Green economic growth, sustainable investment, and ESG (Environmental, Social, and Governance) have encouraged a corporate business to take a more active role in creating an environmentally friendly image through marketing campaigns, corporate value statements, and sustainability reports. Today, the corporate business sector not only maximizes financial profits but also attaches importance to socio-ecological accountability such as being responsible for environmental, social, and governance aspects. Many corporations are trying to show that they are also participating in sustainable and environmentally friendly activities as public awareness of environmental issues increases. Environmental issues are now in the spotlight that affects daily consumer behavior and international policies. This phenomenon encourages companies to compete with each other by building a green image to meet market needs. Along with the increasing implementation of environmental

1. CGS International iTrade, 2026, *Become a Smart Investor by Understanding the Company's Sustainability Report*, https://itrade.cgsi.co.id/jadi-investor-cerdas-dengan-memahami-sustainability-report-perusahaan, accessed August 29, 2026.

regulations in Indonesia, especially the Financial Services Authority Regulation Number 51 of 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies (POJK Number 51/POJK.03/2017) creates sustainable economic growth by harmonizing economic, social, and environmental interests. [2] Financial Services Institutions (LJKs), Issuers, and Public Companies are required to prepare sustainability reports that are prepared separately from the annual report or also as a part that is not separate from the annual report.

A sustainability report is a report announced to the public that contains the Economic, Social Finance, and Environmental performance of the company in running its sustainable business. This arrangement is a form of preventive measures by the government to increase the awareness of entrepreneurs to make sustainable investments and prevent greater environmental damage.

Claims of using environmentally friendly technologies, reducing carbon emissions, or having corporate social responsibility (CSR) programs are some ways to show that a corporation has participated in sustainable development. However, not all of these claims reflect reality. When a corporation gives an exaggerated image or image of its sustainability efforts, this is known as greenwashing. Greenwashing is a misleading claim about a product or process that is more environmentally friendly than it actually is.

A number of companies in the manufacturing, mining, and plantation sectors have been highlighted for making sustainability claims that are not in accordance with how conditions are in the field. [3] The amount of information that still feels ambiguous, the lack of data and evidence from claims, the absence of clear certifications and the facts of companies that are considered not in line with the claims create uncertainty for the public in interpreting environmentally friendly claims.

Various studies show that the main problem is not just the existence of problematic environmental claims, but the absence of a clear legal framework to evaluate the veracity of these claims, especially the claims contained in corporate sustainability reports. This can harm investors, consumers, and undermine public trust. This greenwashing practice also has the potential to undermine healthy business competition and obscure environmental responsibility by companies. The legal inability to provide verification of excessive sustainability claims creates a condition of "*green consumer confusion*" where business actors exploit information to gain an unfair competitive advantage that can damage the integrity of the capital market and consumer protection in Indonesia.

Greenwashing creates the impression that the company is trying to improve environmental conditions when it has not taken any concrete steps to reduce its carbon footprint or minimize the broader adverse impact on the environment. This means that greenwashing is directly contrary to the principle of environmental justice which demands shared responsibility in maintaining the balance of the ecosystem for current and future generations. Companies that state excessive green claims in sustainability reports can create a sense of distrust from the public towards other companies that genuinely care about sustainability. [4]

Transparent and accurate sustainability reports are critical because they help governments, communities, and other stakeholders make decisions and provide the basis for more effective policies in managing environmental and social impacts. Transparency in sustainability reports is essential to assess whether a company's sustainability claims are in line with the facts on the ground and allows other stakeholders to assess the extent to which the company is open to reporting on the environmental and social impacts of the company's operations. [5] Without transparency, greenwashing practices can continue to evolve and increase distrust.

This issue is a matter of corporate legal accountability to investors and shareholders who make investment decisions based on the information presented in the sustainability report. The absence of parameters that explain when a claim can be categorized as inaccurate or legally misleading results in the ambiguity of norms reflected in the use of terms without a credible scientific explanation. Corporations take advantage of the momentum of increasing environmental awareness by the public by including the terms "green", "eco", or "sustainable" without the support of concrete evidence that can be accounted for. The absence of detailed guidelines on environmental claims makes it difficult to identify the boundary between real sustainability commitments and greenwashing practices.

The implications of the ambiguity of these parameters are direct and concrete. For corporations as business actors, the absence of parameters means the absence of operational guidelines regarding the limits that must be maintained in preparing sustainability claims for investors and the public. For investors and shareholders, the absence of parameters means the inability to ensure that the sustainability claims that are the basis of investment decisions have met the standards that can be legally accounted for. As a result, the assessment of greenwashing practices becomes an inconsistency which is contrary to the principle of legal certainty. Clarity of norms is the main indicator in assessing the fulfillment of the principle of legal certainty accompanied by strict parameters regarding the form, standard, and consequences of the implementation of regulations. [6]

The lack of specific regulations on greenwashing in Indonesia indicates a misalignment between corporate accountability and environmental governance. Both law enforcement agencies and companies face uncertainty due to regulations that do not include broad authority and comprehensive and measurable oversight schemes. Companies can take advantage of a positive perception of sustainability without having to go through a thorough environmental performance evaluation if no technical

2. Julius Adi Chandra, *et al*., 2022, *Analysis of the Government's Role in Greenwashing Practices in ESG-Based Financial Investment Strategies*, Journal of Legal Panorama, 7(2), p.143.
3. Angel Astrid Tapilahuwane, *et al*., 2026, *Greenwashing* in the Business World: A Review of Business Morality and Ethics, *Indonesian Journal of Social Science and Education (IJOSSE)*, 2(2), p.941.
4. Zentoni, dkk., 2025, *Criminalizing Greenwashing: Addresing Consumer Protection Challenges in the Era of Sustainability*, *Jurnal LITIGASI*, 26(1), h.114.
5. Ahmad Sholikin, *et al*., 2024, *Greenwashing and the Degree of Transparency in the Extractive Industry Sector in East Java and West Java*, UNISDA Press, Lamongan, p.3.
6. Flora Juniar Manik, 2026, *Analysis of the Legal Obligations of Foreign Citizens Who Conduct Business in Indonesia based on Law Number 25 of 2007 concerning Investment*, Journal of Contemporary Law Studies, 3(2), p.408.

parameters are set. [7]

The more sustainability reports a corporation submits and are accessible to the public, the greater the potential for effective manipulation of information because there are no parameters that establish a boundary between legitimate claims and unlawful claims. Obscuring facts about actual environmental conditions can have a detrimental impact if done sustainably. [8] The absence of an objective setting of assessment parameters makes it difficult for law enforcement agencies and independent watchdogs to verify the validity of sustainability reports. There is no clear enough benchmark to assess whether a claimed emission reduction meets a standard of accountable accuracy and whether the methods used to measure such claims meet the standards recognized and also used by all corporations.

Without assessment parameters, the prohibition of misleading statements contained in positive laws cannot be predicted. The existence of assessment parameters can be a reference in reforming green business laws to create a healthy and fair investment climate and environmental sustainability. Based on these problems, a scientific paper entitled "Legal Regulations on Greenwashing Assessment Parameters in Corporate Sustainability Reports" was raised to analyze the ambiguity of norms and formulate a reconstruction of assessment parameters.

Problem Formulation

1. What is the normative basis for the assessment of greenwashing practices in the corporate sustainability report according to Indonesia's positive law?
2. How is the reconstruction of the legal arrangements regarding the parameters of the assessment of greenwashing practices to provide legal certainty in the corporate sustainability report?

Purpose

The purpose of writing this journal is to analyze the normative basis of Indonesia's positive law relevant to the assessment of greenwashing practices in corporate sustainability reports, as well as to reconstruct legal arrangements regarding the parameters of greenwashing assessment that are normatively necessary to provide legal certainty for corporations, investors, and supervisory authorities.

Discussion

Normative Basis for Assessment of Greenwashing Practices in Sustainability Reports according to Positive Law in Indonesia

Assessing whether a sustainability claim in a corporate report is legally classified as greenwashing requires the availability of two things, namely the norm that prohibits the practice and the parameters that determine when a claim meets the elements of the prohibition. However, currently positive law in Indonesia does not have a specific and comprehensive regulation that defines greenwashing and sets assessment parameters in the corporate sustainability report.

The normative basis for assessing the practice of greenwashing is built through a systematic approach to legal norms spread across various legal regimes. [9]

1. Law Number 8 of 1995 concerning the Capital Market (Capital Market Law)

The Capital Market Law regulates the obligation of issuers to convey true, clear, and non-misleading information to the public. Article 1 number 25 of the Capital Market Law stipulates that activities in the capital market must be based on the principle of information disclosure. Information disclosure is the issuer's responsibility for every information published through digital platforms and ensures that there are no errors in data and information that can mislead investors. If investors suffer losses due to inaccurate or incomplete information, the issuer can be held civil liable based on the principle of compensation. The principle of full disclosure is the main foundation for issuers to disclose all material facts that have the potential to affect investment decisions. [10]

When corporations prepare sustainability reports that contain carbon emission data, net zero emission targets, or ESG claims that are manipulated or not in accordance with real ecological facts, it has the potential to violate the obligation to disclose material information to the public. The prohibition of disclosure of incorrect material information has been emphasized in Article 90 letter c of the Capital Market Law. If environmental claims are proven to be deliberately made to obtain green investments or affect the price of securities, the issuer can be held legally liable under the capital market regime.

In the context of capital market implementation, corporate disinformation practices are categorized as a form of crime considering that material information is vital and the truth must be known absolutely by investors. Juridically, greenwashing can be sued through the mechanism of Unlawful Acts (PMH) or claims for compensation based on Article 80 of the Capital Market Law related to false statements. If it is proven that the environmental claims in the sustainability report are material for investors in making investment decisions and contain elements of fraud, then the investor can claim recovery of losses. [11] According to Greenpeace International, greenwashing is a qualification of corporate disinformation practices that focus on elements of public mislead through the use of sustainability claims. [12]

2. Law Number 40 of 2007 concerning Limited Liability Companies (PT Law)

Normatively, the regulation of Social and Environmental Responsibility in Indonesia is rooted in the PT Law. Through

7. Zico Junius Fernando, dkk., 2025, *Greenwashing as a Crime and the Urgency of Redesigning the Environmental Criminal Law Paradigm*, Jurnal Kajian Pembaruan Hukum, 5(1), h.66.
8. Muhammad Tristan Bias Rembulan, 2024, *Environmental Development Law: Greenwashing, Climate Diplomacy and Deforestation,* Alifba Media, Pamekasan, p.12.
9. Raka Nur Baswara Dascha and Ubaidillah Kamal, 2025, *Consumer Protection of Greenwashing Practices in Indonesia*, KeadilaN Journal of the Faculty of Law, Tulang Bawang University, 23(2), p.177.
10. Adolf Fictor, *et al*., 2026, *Legal Responsibility of Issuers for Information Disclosure in Digital Technology-based Public Offerings in the Indonesian Capital Market*, Honeste Vivere Journal, 36(2), p.116.
11. Sudaryat, 2026, *Contemporary Capital Market Law Doctrine, Litigation, and Challenges of the Digital Era,* Nuansa Cendekia Publisher, Bandung, p.112.
12. Muhammad Daffa Alfandy, 2025, *Ideal Format for Feasibility Standards for Green Bond Recipient Projects as Legal Protection for Investors from the Risk of Greenwashing Practices in the Capital Market*, Forschungsforum Law Journal Research and Debate Forum of Students, Faculty of Law, UPN Veteran Jakarta, 2(3), p.252.

the provisions of Article 74 of the PT Law, companies that carry out their business activities in the field and/or related to natural resources are required to carry out social and environmental responsibility. This provision shows that the state has recognized the importance of corporate contributions in encouraging environmental conservation. However, Article 74 of the PT Law does not regulate technical reporting, audit mechanisms and independent verification that create ambiguity in sustainability reporting practices and can claim sustainability can be manipulated by companies through green communication strategies without real action. [13]

3. Law Number 32 of 2009 concerning Environmental Protection and Management (PPLH Law)

The normative framework for the enforcement of ecological justice in Indonesia is essentially based on the mandate of sustainability data disclosure as mandated in the PPLH Law. This legal system places transparency as an instrument of public supervision through the guarantee of the Right to Access to Environmental Information in Article 65 paragraph (2) and is an obligation for every person who makes an effort to present information on environmental management accurately and correctly based on Article 68 letter a of the PPLH Law. The prohibition on the submission of misleading information is also emphasized through Article 69 paragraph (1) letter j of the PPLH Law. [14]

4. Financial Services Authority Regulation Number 51 of 2017 concerning the Implementation of Sustainable Finance for Financial Services Institutions, Issuers, and Public Companies (POJK Sustainable Finance)

In addition to being regulated in the legal framework of the capital market, the principle of information disclosure also has a sectoral foundation through the Sustainable Finance POJK. Based on Article 1 number 8 of the Sustainable Finance POJK, sustainable finance is defined as the comprehensive support of the financial services sector to create sustainable economic growth through the alignment of economic, social, and environmental interests. The principle of openness can also be found in Article 10 of the Sustainable Finance POJK which requires Financial Services Institutions, Issuers, and Public Companies to prepare sustainability reports. However, the Financial POJK also provides flexibility to issuers so that the quality of sustainability reports is very diverse so that it shows fundamental normative limitations such as: [15]

- Sustainability reporting obligations are still constructed separately from the information disclosure regime in the capital market. This normative separation results in the disclosure of social-environmental aspects often required as a complementary document.
- Discrepancies in global standards. The reporting standards adopted in the current regulations are not in line with the international standards issued by the International Sustainability Standards Board (ISSB), especially IFRS S1 (General Requirements for Disclosure of Sustainability-related Financial Information) and IFRS S2 (Climate-related Disclosures) so that the quality and comparability of reports between issuers are still very diverse.
- Absence of verification and law enforcement instruments. POJK Finance currently has not set up a strict verification audit mechanism to crack down on the manipulation of sustainability data. Without any verification of the material truth in the claim, it has the potential to become a vulnerable gap in sustainability reporting. As a result, the implementation of sustainability reporting obligations tends to be oriented towards fulfilling administrative obligations rather than ensuring the quality, accuracy, and verification of information submitted to the public.

The implementation of the Financial POJK still requires strict oversight and the development of more specific sustainability performance indicators to prevent companies from simply fulfilling formalities without any real substance in sustainability practices. [16]

John Rawls in "A Theory of Justice" emphasized that a rational conception of justice must meet the requirements of publicity. [17] In this context, sustainability reports serve as a normative publicity medium that allows the public to assess whether corporations have carried out their business activities without harming the environment. Transparency of sustainability information serves to protect the basic rights of market participants to fair treatment while minimizing unauthorized profits due to manipulation of environmental claims.

Indonesia's positive law has essentially a variety of norms that govern information disclosure obligations, corporate transparency, and sustainability reporting. However, the current rules have not yet established a normative parameter that can be used to assess greenwashing practices in sustainability reporting. The applicable regulations are still sectoral, spread across various legal regimes, and do not provide a uniform measure of the boundaries between legitimate sustainability claims and misleading claims.

Reconstruction of Legal Arrangements on Parameters for Assessing Greenwashing Practices to Realize Legal Certainty in Corporate Sustainability Reports

The main problem in the regulation of greenwashing in Indonesia does not lie in the absence of a legal obligation for corporations to submit sustainability information, but in the lack of parameters that can be used to determine when a deviation in the sustainability report has reached a level that can be qualified as greenwashing.

The reconstruction of the parameters of the greenwashing

13. Muh Syah Quddus, 2025, *CSR and Greenwashing: Legal Responsibility for Corporate Pseudo-Branding Practices*, Journal of the Proceedings of the National Seminar on Social and Political Science Law, 2(1), p.15.
14. Sebastian Burhannudin Saputra, *et al*., 2026, *Class Action Lawsuit as a Legal Instrument Against Greenwashing*, Causa Journal of Law and Citizenship, 17(7), p.8.
15. Kadek Jasa Kusumantara, *et al*., 2026, *The Urgency of Updating Issuer Information Disclosure Regulations in the Indonesian Capital Market in Facing ESG-Based Corporate Governance Challenges*, Honeste Vivere Journal, 36(2), p.104-105.
16. Agustinus Prajaka W. Baskara and Febryanti Simon, 2025, *Sustainability Law: The Initial Initiation of Integration of Sustainability Regulations in Indonesia*, PT. Nasya Expanding Management, Central Java, p.187.
17. Debrina Rahmawati, 2025, *The Urgency of the Establishment of Greenwashing Regulations: A Comparative Study and Implications for Indonesia*, Legal Scientific Journal of Wisnuwadhana University of Malang, 19(1), p.100.

assessment that normatively meet the standards of legal certainty cannot be done by simply clarifying the existing prohibitions. The rules regarding the correct disclosure of information, data transparency, and the prohibition of the submission of misleading information have basically been regulated, but they are still general and have not provided clear limits. Therefore, the reconstruction of the regulation regarding the parameters of the assessment of greenwashing practices is not directed to form a new legal regime, but to operationalize existing norms through parameters that can be used objectively in the assessment and proof process.

1. Threshold of material mismatch between claims and verifiable factual conditions

The absence of standard assessment parameters in Indonesia's positive law results in a blurring of norms in distinguishing between real sustainability commitments and manipulation of corporate image and can trigger disputes between investors, governments, and affected communities, thereby disrupting the stability of the national investment climate. [18] In order to create legal certainty for business actors, investors, and consumers, a threshold of material incompatibility between published sustainability claims and factual conditions that can be scientifically verified, objective, and relevant in the field is required.

A sustainability claim can be said to be a material non-conformity if there is a substantial difference between what the corporation submits and how the actual factual conditions are. These differences have the potential to affect the understanding, assessment, or decision-making of information users. Materiality is determined by considering the relevance of the information, the scope of impact, and the consequences that can arise from the non-conformity. This approach is necessary so that not every inaccuracies in the sustainability report are automatically qualified as greenwashing, but only non-conformities that have a certain level of significance to the meaning and credibility of the claim.

Referring to the legal obligation to present environmental information correctly, accurately, and openly, information is qualified to experience material inconsistencies if falsification or obscuration of such facts affects the judgment and decisions of the information users. Indonesia can reconstruct these parameters by adopting a two-step assessment approach from global standards such as the European Sustainability Reporting Standards (ESRS) with a double materiality approach. In measuring materiality, the threshold of nonconformity is assessed from the severity scale, scope of impact, irremediable character, and the level of probability of impact from the company's operational activities. [19] This assessment can be used as a comparative basis to establish a more objective measure of materiality in national law. The structure of this parameter allows the assessment of greenwashing to be carried out in stages and proportionate to be able to determine when a sustainability claim has legal consequences.

2. Methodology for proving the element of intentionality through objective indicators

In the civil perspective of a lawsuit for compensation for Unlawful Acts (PMH) Article 1365 of the Civil Code, the difficulty of proving the element of intentionality is often a shield for corporations to escape legal liability. [20] Therefore, a methodology to prove the element of intentionality is needed using objective indicators in the field. This methodology uses three main objective indicators to construct the existence of intentional provision of misleading information:

- **Implementation of selective disclosure**

Corporations systematically present positive ESG data in order to build a green image or attract green investments, but consciously hide or omit actual carbon pollution or emission data.

- **Claim future commitments without an implementation plan**

Corporations publish long-term green targets without being supported by realistic work plans, without concrete resource allocation, and without independent third-party verification.

- **Misleading general environmental claims**

Corporations use ambiguous claims such as "eco-friendly", "sustainable", or "natural" on the business as a whole, even though these environmental advantages apply only to a small part of the business's activities. [21]

3. A measurable standard that can be audited consistently.

The legal certainty of sustainability reports requires a standard measurement standard that can be consistently audited by an independent third party. Third parties can act as assurance in ensuring the validity of non-financial data to avoid greenwashing practices. This transparency of non-financial data allows investors to make more responsible decisions and in line with global ethical values. [22] However, currently, there are no civil and criminal liability standards for independent third parties in providing opinions on the disclosure of non-financial data, such as biodiversity impacts, labor gender ratios, and energy intensity. This is different from financial audits which are based on rigid Financial Accounting Standards and have definite transaction data. This implication opens a gap for lawsuits for unlawful acts based on Article 1365 of the Civil Code if investors suffer losses due to relying on sustainability reports that have obtained assurance. [23]

This standardization requires corporations to obtain a certificate of conformity issued by a licensed independent auditor or verifier before such sustainability reports or claims

18. Aisyah, dkk., 2025, *Legal Review of The Transfer of Waqf Land Functions for Commercial Purposes,* Leges Private Civil Law Science, 2(1), h.64.
19. Felix E. Mezzanotte, 2023, *Corporate Sustainability Reporting: Double Materiality, Impacts, and Legal Risk,* Journal of Corporate Law Studies, 23(2), h.641.
20. Syifa Fauziah, *et al*., 2026, *Corporate Civil Liability for Greenwashing Practices (Environmentally Friendly False Image) in the Legal Perspective of Consumer Protection,* Journal of Multidisciplinary Scientific Research, 3(1), p.2607.
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22. Oheo Kaimuddin Haris, 2026, *Mining Law in Indonesia*, Eureka Media Aksara, Purbalingga, p.241.
23. Hendi, *et al*., 2026, *Juridical Analysis of Legal Protection for Public Accountants as Assessors of Sustainability Reports in Indonesia,* Journal of Social & Legal Sciences, 4(1), p.7095.

are published to the public. [24] In addition, sustainability audit standards are also gradually transformed from *limited assurance* to reasonable *assurance* and provide preventive legal protection for public accountants as the appraiser of sustainability reports by clearly setting liability limits. [25] This is to provide a guarantee of legal protection for public accountants if they take out an insurance commitment sustainability report.

Measurability standards must also ensure consistency between periods of the testing process. If different methods are used to calculate the same indicators, the results of the report cannot be adequately compared. With this standard, the auditor who conducts the assurance can obtain relatively consistent results so that a claim can be judged not only by what is said, but also by how the numbers or conclusions in the claim are obtained.

Thus, the reconstruction of the greenwashing assessment proposed by the author is not solely based on the existence of excessive environmental statements, but also built through the relationship between claims, facts, materiality, knowledge, and proof so that greenwashing is not just a criticism of the corporate image, but also includes legal issues that can be tested based on measurable parameters in order to be able to create an accountable, transparent, and sustainable business environment.

Closing

Conclusion & Suggestion

The normative basis for assessing greenwashing practices according to positive law Indonesia basically has various norms that regulate information disclosure and corporate sustainability reporting. The current rules are still spread across various legal regimes such as the Capital Market Law, the PT Law, the PPLH Law, and the Financial POJK which together form a normative framework by prohibiting the submission of misleading information in corporate sustainability reports. However, the framework has not yet established a parameter that can be used to assess greenwashing practices consistently and has not provided a boundary between legitimate sustainability claims and misleading claims. Reconstruction of legal regulations regarding the parameters of the assessment of greenwashing practices is needed to realize legal certainty in the corporate sustainability report which is built through the three parameters proposed by the author, namely the threshold parameters of material non-conformity, the methodology parameters of proving the element of intentionality through objective indicators, and the parameters of measurability standards that can be audited consistently. These three parameters are intended to operationalize existing norms so that the prohibition of submitting misleading information can be applied objectively and consistently in the process of assessing and proving greenwashing in corporate sustainability reports. Therefore, the Government and OJK need to strengthen sustainability reporting regulations by developing an assessment mechanism through measurable and legally enforceable parameters. These parameters should be incorporated into the sustainability reporting framework through binding regulations and equipped with technical guidelines to ensure that their implementation is consistently carried out by companies and auditors. This reconstruction is not for the establishment of new greenwashing rules, but to harmonize relevant best practices. Through this approach, it is hoped that sustainability reporting can develop into an accountable legal instrument, able to prevent misleading sustainability claims, strengthen protections for investors, the public and ensure legal certainty for other stakeholders.

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24. J. MacLenna and W. De Catelle, Op.Cit, h.461.
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