

Behind the Labels:

Empowering Consumers to Identify and Respond to Greenwashing and Humanewashing

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A photograph of a herd of cattle in a grassy field, overlaid with a semi-transparent teal filter. The text is centered over the image.

Part 1

About AEL

Advocacy



About AEL Advocacy

AEL Advocacy is an intersectional animal and environmental law organization dedicated to advancing justice for animals, people, and the planet.

Through bold advocacy, public legal education, and law reform initiatives, we work to ensure that animals and nature are protected and recognized as essential to a just, thriving, and sustainable future.

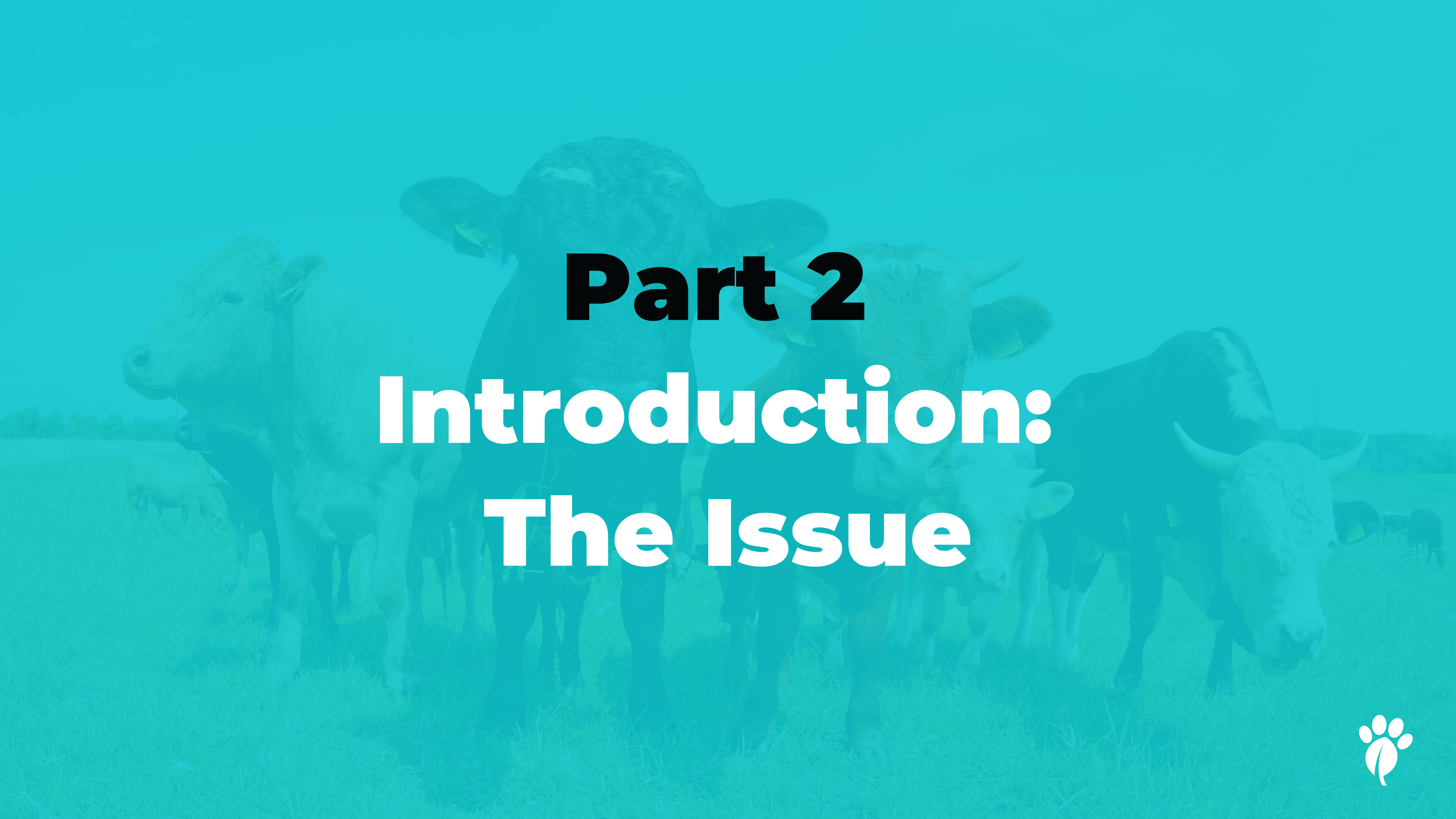


Website: aeladvocacy.ca
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Disclaimer: The information in this presentation is not intended to be legal advice.



A photograph of a herd of cattle in a grassy field, overlaid with a semi-transparent teal filter. The text is centered over the image.

Part 2

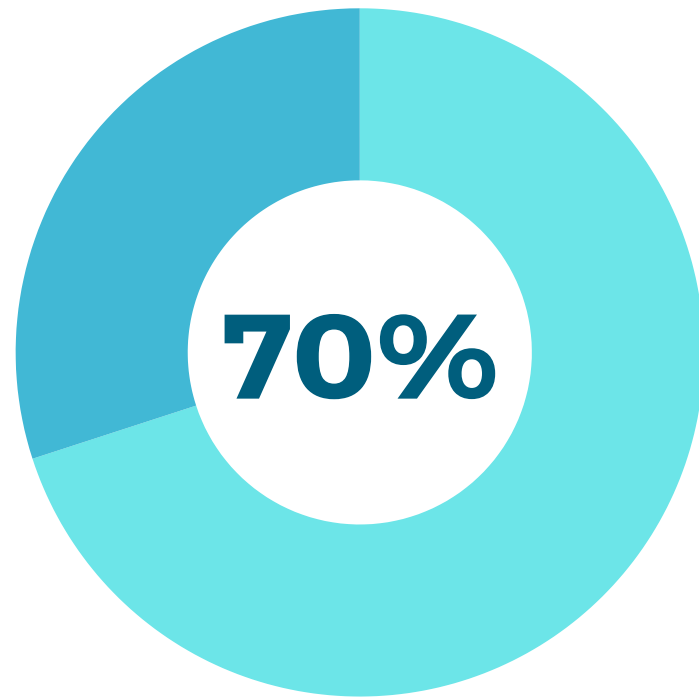
Introduction:

The Issue





Surveys show that approximately:



of consumers seek out environmentally friendly food options



look for products labeled as humanely produced



Part 3

Understanding and Identifying Greenwashing and Humanewashing



What is Greenwashing?

Greenwashing is the practice of making a misleading claim about the environmental impact of a company's products and operations.

Buzzwords like “regenerative grazing”, “low-carbon”, and “sustainable” are often used to market animal products to eco-conscious consumers.

What is Humanewashing?

Humanewashing is the practice of making a misleading claim about the treatment of animals or the conditions in which they are born, raised, or killed.

Labels like “humanely raised,” “free-range,” and “ethically sourced” are often used to market animal products – while masking the reality of industrial farming practices.



Spotting Redflags: Common Tactics Used to Mislead Consumers

Vague & Unsubstantiated Claims	Terms like "eco-friendly," "carbon-neutral," "biodegradable," "cage-free," and "humanely raised" often lack proof, legal definitions, or enforceable standards.
False Certifications & Labels	Fake or weak self-regulated labels that mimic legitimate third-party certifications.
Irrelevant Information	Marketing claims that distract from bigger issues by emphasizing benefits that are standard across all products in a category.
Hidden Trade-offs	Highlighting a minor environmental or welfare benefit while concealing larger, more harmful impacts elsewhere in the product's lifecycle.
Misleading Imagery	Use of green colours, leaves, or happy animals to imply eco-friendliness or humane treatment without factual backing.



Why Does It Matter?

Greenwashing and humanewashing:

- Undermine consumer trust
- Make it difficult to distinguish between legitimate and deceptive claims
- Disadvantage businesses that genuinely adhere to ethical and sustainable practices





Part 4

The Legal Framework



The Legal Framework for Advertising in Canada

1. The Canadian Code of Advertising Standards

- Administered by Advertising Standards Canada (“Ad Standards”), a self-regulatory industry body
- Requires ads to be **"accurate and clear"**
- Not legally enforceable



2. The Competition Act

- Administered by the Competition Bureau, a federal government agency
- Prohibits “**false or misleading**” representations and deceptive marketing practices
- Contains both criminal and civil provisions
- In 2024, the Act was amended to include specific provisions targeting greenwashing
 - Environmental product claims must be:
 - Supported by **adequate and proper testing**
 - Business activity claims must be:
 - Based on verifiable evidence using an **internationally recognized methodology**
 - Reverse onus rule



Both the Competition Bureau and Ad Standards consider the “**general impression**” the ad conveys, as well as its literal meaning.



McDonald's Quarter Pounder Billboard Ad

THE QUARTER POUNDER.[®]
CANADIAN BEEF.
NOW SUSTAINABLY
SOURCED.*



*At least 30% of our Quarter Pounder[®] beef is from certified sustainable sources that meet CRSB standards. crsb.ca

Quarter Pounder[®] burgers available at participating McDonald's restaurants in Canada.
© 2010 McDonald's



Keurig Canada's Coffee Pod Recycling Claims



100% of K-Cup® Pods are Recyclable*



IN CANADA, CONSUMER ACTION MATTERS NOW MORE THAN EVER

- In 2019, Ad Standards Canada eliminated the Special Interest Group Complaint Procedure
- Public interest organizations like AEL Advocacy now face a \$2,000 filing fee per complaint
- **What this means:** Individual consumers must step up to challenge misleading claims



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Part 5

Our Report and Consumer Action Toolkit



BEHIND THE LABELS



Consumer strategies for identifying and responding to greenwashing and humanewashing in Canada

AEL
ADVOCACY
Animal Environmental Legal Advocacy

BEHIND THE LABELS

ACTION TOOLKIT



A consumer action toolkit for fighting greenwashing and humanewashing in Canada

AEL
ADVOCACY
Animal Environmental Legal Advocacy



Key Toolkit Features



Tips for identifying misleading claims



Step-by-step guide for filing complaints



Ready-to-use letter templates for contacting companies and regulators



What Are The Terms?

Greenwashing is when companies mislead consumers about their environmental practices or the environmental benefits of a product or service.

Humanewashing is the practice of misleading consumers about the treatment of animals in the production of goods.

Red Flags for Greenwashing

Vague buzzwords: Terms like “eco-friendly,” “natural,” or “sustainable” that lack clear, verifiable evidence.

Unverified certifications: Logos or labels that are not backed by recognized industry standards.

Misleading imagery: Use of green packaging or nature imagery that does not align with actual product sustainability.

Lack of transparency: No accessible, detailed information on sourcing, production methods, or third-party verification.

Hidden trade-offs: Overlooking or downplaying other environmental impacts (e.g., over-packaging, poor waste management).

Red Flags for Humanewashing

Misleading welfare terms: Phrases like “cage-free,” “humanely raised,” or “free range” without clear definitions, standards, or third-party verification.

Deceptive imagery: Photos of happy animals or idyllic farm scenes that don’t reflect actual living conditions.

Weak or unverified welfare certifications: Labels or claims of humane practices unsupported by credible certifying bodies.



Sample List of Buzzwords

Greenwashing









- Carbon-neutral
- Clean
- Climate-friendly
- Eco-conscious
- Eco-friendly
- Environmentally conscious
- Environmentally friendly
- Green
- Low-carbon
- Low-emission
- Minimal impact
- Minimal waste
- Net-zero
- Non-toxic
- Renewable
- Renewable energy
- Responsibly caught
- Responsibly farmed
- Responsibly sourced
- Sustainable
- Sustainable sourcing
- Sustainably farmed
- Sustainably raised
- Sustainably sourced
- Waste-free
- Water-conscious
- Water-saving
- Zero carbon
- Zero emission
- Zero footprint
- Zero impact
- Zero waste

Humanewashing

- Cage-free
- Certified humane
- Conscious
- Cruelty-free
- Enriched cages
- Ethical
- Farm fresh
- Free-range
- Grass-fed
- Harvested responsibly
- Humanely farmed
- Humanely raised
- Pasture-raised
- Plant-based
- Pure
- Wild caught



Step 1: Check for Trusted Third-Party Certifications

Weak or Misleading Claim	Trusted Certification	Logo(s)
Company's own "vegan" or "plant-based" label	Certified Vegan or Vegan Trademark	 
"Sustainable" with no independent proof	B Corp	
Company's own "no animal testing" label	Leaping bunny or PETA's Beauty Without Bunnies	 
"Eco-friendly" (without specific standards or verification)	Forest Stewardship Council (FSC)	  

Note: Refer to **Appendix A** of our report **"Behind the Labels: Consumer Strategies for Identifying and Responding to Greenwashing and Humanewashing in Canada"** for more details.

Certified Vegan



What It Means: The Certified Vegan^[32] label guarantees that a product:

- Contains no animal ingredients or by-products
- Has not been tested on animals at any stage
- Is free from animal-derived GMOs or genes
- Has been independently verified by the certifying body

If a product is made on shared equipment (also used to produce items with animal ingredients), the company must provide proof of thorough cleaning protocols to prevent cross-contamination.

How It's Certified: Companies apply through the Vegan Action (Vegan.org) and must:

- Submit detailed documentation of all ingredients and production processes
- Often coordinate with suppliers and manufacturers to confirm compliance
- Renew their certification annually, including payment of a certification fee

Certifying Organization: Vegan Action, a U.S.-based non-profit, promotes veganism through public education and its product certification program.

Similar/Misleading Symbols: Don't confuse this trusted certification with less reliable terms or symbols. Labels like:

- "Plant-based" – may still contain animal-derived ingredients
- "Cruelty-free" – typically refers to animal testing, not ingredients
- "Lactose-free" – still often contains dairy

Step 2: Research the Company

Check the company's website: Visit the company's website to verify its claims. Look for sustainability reports, supply chain transparency, and trusted third-party certifications.

Read reviews and independent reports: Seek reviews and reports from consumer watchdog groups, non-profits, and investigative journalists. Organizations like Ethical Consumer, Greenpeace, and B Lab are known for evaluating corporate environmental and ethical practices.

Look for supporting evidence: Trustworthy companies provide verifiable proof for their claims, such as detailed product labels, QR codes linking to additional information, or references to scientific studies. Consumers should be able to easily access and evaluate this supporting information.

Check government enforcement actions: Look for any actions taken by regulatory bodies such as the Competition Bureau or Ad Standards regarding the company's advertising practices.

Step 3: Analyze the Product


Read the fine print: Is the environmental or animal welfare claim clearly defined and backed by specifics—or is it vague and open to interpretation?

Look for contradictions: Does the product advertised as "sustainable" still come in plastic packaging, or is the "cage-free" product sourced from a farm that doesn't meet established standards?

If a claim sounds good but lacks clarity or consistency, it's worth questioning. Always look for verifiable standards or certifications to support what's being advertised.



Guide to Filing a Complaint



How to Report
False Advertising

Choosing the Right Complaint Mechanism

Complaint Body	What It Enforces	What It Prohibits	Best Used For
Ad Standards (Self-regulatory industry body)	Canadian Code of Advertising Standards	<ul style="list-style-type: none">False or misleading adsOmission of important informationDisclaimers/footnotes that are not clearly visible/audibleClaims that lack verifiable evidenceClaims that create a misleading general impression	Complaints about ads (TV, online, packaging, etc.) that appear misleading or exaggerated , even if not illegal. Can lead to ads being amended or withdrawn .
Competition Bureau (Federal law enforcement agency)	Competition Act and Consumer Packaging and Labelling Act	<ul style="list-style-type: none">False or misleading representationsGreen claims not backed by adequate and proper testingFalse or misleading product labelling (e.g. origin, contents)Deceptive marketing practicesClaims that create a misleading general impression	Complaints about fraudulent or deceptive commercial practices , including greenwashing or humanewashing that could mislead the public. Can lead to investigations, fines, or legal action .

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How to Report
False Advertising

Step-by-step guide for reporting to Ad Standards

Step 01:

Identify the Ad

Review Section II of AEL Advocacy's ["Behind the Labels"](#) Report to help you identify humanewashing and greenwashing.

Step 02:

Gather Relevant Information

- Advertiser
- The date & time of the advertisement
- Where you saw the advertisement (TV, radio, online, print, etc.)
- A description of the specific content
- If possible, take a screenshot, copy, or recording of the advertisement to submit with your complaint.

Step 03:

Complete the Online Complaint Form

Fill in the [Online Complaint Submission Form](#), ensuring you provide:

- Your contact information
- The advertiser's details
- The type and content of the advertisement
- A clear description of how the ad violates the Code

You can use our template complaint to help guide your submission.

If you prefer to mail your complaint, send it to Ad Standards at 33 Bloor St. East, Suite 303, Toronto, ON, M4W 3H1.

Step 04:

Submit Any Supporting Evidence

If you have a copy, image, or recording of the advertisement, attach it to the online form or provide a link if it's available online. Supporting documentation can strengthen your case, so be sure to include as much detail as possible.

Step 05:

Submit Your Complaint and Follow Up

- Review your submission and hit "Submit". You'll receive a confirmation email from Ad Standards.
- Ad Standards may contact you if they need more information.
- If the ad violates the Canadian Code of Advertising Standards, the advertiser may be asked to withdraw or change it.

Tip

Focus on how the ad could mislead the average consumer – **not just your personal opinion.**

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[Insert date]

Ad Standards
33 Bloor Street East, Suite 303
Toronto, Ontario M4W 3H1

Via Online Submission

To Whom It May Concern:

Re: Complaint Concerning [Insert Advertisement Details]

I am writing to you as a concerned citizen. Please accept this letter as a formal complaint regarding a misleading [Advertiser] advertisement that has been appearing on [Medium or Platform] in violation of the Canadian Code of Advertising Standards (the "Code"). I request that Ad Standards take action to enforce the Code and ensure the [Advertiser] withdraw the advertisement.

1. The Advertisement

A photo of the problematic advertisement is depicted below. The [Advertiser] ad appeared on [Medium or platform] on [Date of discovery]. Other versions of the advertisement (containing the same text) were seen on or about the same day on [Other applicable mediums or platforms].

[Image and description of the Ad]

The [Advertiser] Ad is designed to [Goal of the Ad – Ex: Presents a product as environmentally friendly]. This is inaccurate, deceptive and misleading. [Reasons why]

2. Deceptive and Misleading Information

The first deceptive and misleading claim made in the [Advertiser] Ad is that [Description of deceptive and misleading claim – include any support or source the Ad may use to back up their claim. You may wish to research that source].

The claim made in the [Advertiser] Ad is deceptive and misleading because of [Reasons – for common deceptive and misleading practices, see [Behind the Labels](#) (link) report from Animal Environmental Legal Advocacy or the Code provisions linked below].

[Include any research you have done that shows why the Ad is misleading and deceptive].

3. The Canadian Code of Advertising Standards

1



Tips for Spreading Awareness

- Share your findings on social media
- Leave reviews
- Organize consumer campaigns to pressure companies & regulators
- Talk to friends and family about your concerns
- **Collective pressure can drive companies to align their actions with their claims**



Together, We Can Make a Difference.

Every complaint filed and misleading ad exposed brings us closer to a transparent marketplace.

Download the resources and start taking action now:



Report



Toolkit



Thank you!

Website: aeladvocacy.ca

Socials: [@aeladvocacy](https://www.instagram.com/aeladvocacy)

Phone: 613-550-3162

E-mail: admin@aeladvocacy.ca

Visit our website:

