



10 September 2025

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Senator Sarah Hanson-Young
Chair, Senate Standing Committees on Environment and Communications
PO Box 6100
Parliament House
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Dear Senator

Re: Inquiry into Greenwashing

Thank you for the invitation of 5 August 2025, to the Australian Competition and Consumer Commission (ACCC), to make a supplementary submission to the Senate Environment and Communications References Committee Inquiry into greenwashing (the Inquiry).

In 2025 the ACCC continues to prioritise consumer, fair trading and competition concerns in relation to environmental claims and sustainability, with a focus on greenwashing.

Recent enforcement cases

Since the ACCC's submission to the Inquiry of 22 June 2023 (Submission No. 60), and our supplementary submission of 12 January 2024 (Submission No. 60.1), we have commenced two Federal Court proceedings (in June and July 2025) for alleged greenwashing conduct:

- We allege [Australian Gas Networks](#) misled millions of consumers when it represented, in ads that ran during 2022 and 2023, that the gas it distributes to households on its network will be renewable within a generation. We allege Australian Gas Networks did not have reasonable grounds (including because of significant technical and economic barriers) for making the unqualified claim about the future of gas, which featured in advertisements run on free-to-air television, streaming services and on YouTube.
- We allege [Edgewell Personal Care Australia Pty Ltd and its US-based parent company, Edgewell Personal Care Company or Edgewell PCC](#), made false or misleading claims that its popular Hawaiian Tropic and Banana Boat branded sunscreens were 'reef friendly' between August 2020 and December 2024. Edgewell claimed that the sunscreens were 'reef friendly', including because they did not contain 'oxybenzone or octinoxate'. These chemicals have been banned in some jurisdictions, including the State of Hawaii, due to the damage they cause to reefs. However, the sunscreens contained other ingredients which we allege either cause harm to reefs, including coral and marine life, or risk causing harm to reefs.

Other work

The ACCC continues to work directly with industry associations and businesses to address concerns that they identify about environmental claims. This engagement directly with businesses can rectify and address low level misconduct to ensure that there are fair trading practices in the market. Close engagement with business enables us to provide regulatory

support where needed. In December 2024 we published final guidance for businesses on [sustainability collaborations and Australian competition law](#) (Attachment A to this letter).

Complementing the guidance we issued in December 2023 on [Making Environmental Claims](#) we are progressing additional guidance to assist businesses with making sustainability claims in relation to carbon emissions and offsets. The supplementary guidance, once published, will be principles-based to ensure broad applicability, as well as provide best practice examples.

We continue to engage with our fellow regulators at a domestic and international level to monitor cases of interest, and support a coordinated and consistent approach to greenwashing, where possible.

Should you wish to discuss this supplementary submission, please contact Lauren White, ACCC Sustainability Taskforce lead

Yours sincerely

Sarah Proudfoot

Chief Executive Officer