Durably Sustainability Claims Risk Scan

Methodology summary — how the scan works · Last updated 11 November 2026

Legal basis: the EU Empowering Consumers Directive ("EmpCo", Directive (EU) 2024/825) • the EU Forced Labour Regulation (Regulation (EU) 2024/3015)

This scan is a first-pass screening tool. It is not a legal opinion, a certification or an audit. It reads a company's public sustainability statements and points out wording that may be too vague, may lack supporting evidence, may fall under the EU rules on claims made to consumers, may suggest a stronger guarantee about forced labour in the supply chain than the company can show, or may be contradicted by public information from other sources.

Technical terms are explained where they first appear. A list of all abbreviations and terms is given in Section 11.

1. What the scan checks

The scan tests claims against two EU legal frameworks. Wider frameworks for responsible business (last row of the table) are used only as a reference to judge whether social claims are supported by evidence. They are not scored separately.

Framework	How the scan uses it
EmpCo (Directive (EU) 2024/825)	EmpCo is the short name for the "Empowering Consumers for the Green Transition" Directive. It is the scan's main framework for green claims. It also covers some social claims: under Article 6(1)(b) of the Unfair Commercial Practices Directive, as amended, claims about environmental or social characteristics (for example wages, safety, human rights, equal treatment, inclusion and diversity) must not be misleading. EU Member States had to put EmpCo into national law by 27 March 2026. The rules apply from 27 September 2026. The scan pays most attention to: generic environmental claims, climate-neutral or offsetting claims, self-made sustainability labels, broad absolute wording, claims about future environmental performance, comparisons, and legal requirements presented as a sustainability benefit.
EU Forced Labour Regulation (Regulation (EU) 2024/3015)	The scan's main framework for claims about forced labour and supply chains. The Regulation bans products made with forced labour from the EU market. It is about market access and customs checks, not about advertising claims. Article 1(3) confirms that it creates no new due-diligence duty of its own. The scan uses it to flag wording that suggests products, suppliers or supply chains are free from forced labour, or that traceability, due diligence or import and export controls give more assurance than the company can show. The main ban and enforcement rules apply from 14 December 2027. A few governance rules have applied since 13 December 2024.
Unfair Commercial Practices Directive (UCPD): what counts as an environmental claim	Supports the EmpCo check. The scan looks at whether text, images, symbols, labels, brand names or the way something is presented suggest a positive, zero, reduced, comparative or improved effect on the environment.
Supporting frameworks: OECD Guidelines, UN Guiding Principles (UNGPs), ILO standards, GRI	Reference points for social and forced-labour claims. The scan checks whether a claim explains how the company identifies, prevents and limits harm to people, and how specific, balanced and evidenced the claim is. The full names are given in Section 11.

2. Potentially prohibited vs. problematic claims (EmpCo)

Every green or social claim the scan keeps also receives one of two labels in the report: **Potentially Prohibited (Annex I)** or **Problematic (case-by-case)**. These labels are a screening indicator, not a legal finding.

Label	Meaning
Potentially Prohibited (Annex I)	Annex I of the Unfair Commercial Practices Directive (UCPD) is a list of practices that are always unfair. EmpCo (Directive (EU) 2024/825) added new practices to it. A claim gets this label when its wording looks like one of them: • a sustainability label that is not based on a recognised certification scheme or set up by public authorities; • a generic environmental claim (such as "eco-friendly") that is not clearly specified in the same place and not backed by recognised excellent environmental performance; • a claim that a specific **product** is climate neutral, or has a reduced or positive climate impact, because of offsetting; • a legal requirement presented as a special sustainability feature. From 27 September 2026, these practices are unfair automatically when the conditions are met. No separate test of the effect on consumers is needed.

Label	Meaning
What the scan can and cannot confirm	The scan only recognises the *wording pattern*. It cannot confirm the legal conditions, such as whether the claim is addressed to consumers (a business-to-consumer, or B2C, practice), whether it is about a product, brand or company, whether the specification is clear and prominent in the same place as the claim (on a website the scan looks for it on the same page, but cannot judge how prominent it is), and whether the company can show recognised excellent environmental performance. A claim such as “carbon neutral” without a stated scope is treated as a generic claim (point 4a), even when it concerns the whole company. Only wording that names its scope or basis, or is clearly specified in the same place, falls outside this list and is assessed case by case.
Problematic (case-by-case)	Not on the Annex I list, so not automatically unfair — but not automatically acceptable either. The claim can still be judged misleading after an individual assessment under the general UCPD rules (Articles 6 and 7, or Article 6(2)(d) for claims about future environmental performance). Under Article 12(a) and (b) UCPD (a rule that already existed before EmpCo), national courts and authorities can, where appropriate, ask a company to provide evidence that its factual claims are accurate. If the evidence is not provided or is not good enough, they can treat the claims as inaccurate. Companies should therefore be able to support their factual claims. How this works in practice depends on national procedure. Whether the wording is finally judged misleading depends on the context and the likely effect on consumers. The scan does not decide this.

Automatic minimum score. When at least one green claim is labelled **Potentially Prohibited (Annex I)**, the green score and the overall score are automatically raised to a minimum, whatever the normal calculation in Section 6 gives. The wording match with the fixed Annex I list is an automated indicator, not a confirmed legal finding. It is treated as more serious than a case-by-case claim, and averaging it with the other score components would hide that.

For material aimed at clients or consumers, the minimum is 75/100 (the Very high band), because EmpCo and the UCPD apply most directly there. For material that is mainly investor or internal/governance content, the minimum is lower (about 56–68/100, usually the High band), because the rules reach that material only indirectly.

The full minimum applies when two or more claims match, or when one claim is worded as a present-tense statement. When the only match is a single wording that is an **ambition** (for example “our ambition is to offer sustainable solutions”), the minimum is 50/100 (the High band) instead. A claim taken from a document of a parent or group company does not trigger the minimum at all, because that is not advertising by the scanned company.

The rule can only raise a score. If the normal calculation already reaches the minimum, nothing changes. Social claims have no fixed Annex I list (they are assessed case by case, using the Forced Labour Regulation framework in Section 1), so this rule never raises the social score.

3. What the scan keeps as a claim

The scan does not simply search for keywords. A word is kept (“retained”) only when the text around it seems to make, suggest or visually imply a claim about environmental or social performance. Neutral mentions such as *working with suppliers* or *backing local suppliers* are not kept, unless they also suggest assurance, compliance, certification, traceability, audits, due diligence or full supply-chain coverage. The scan follows relevant links on the website. When a PDF report (for example an annual or sustainability report) is linked directly from the company’s own site, the scan reads it as well as the web pages.

Choosing the website. If you enter a company name instead of a web address, the scan looks for the official website and asks you to confirm it whenever it is not certain which one is meant. If the web address does not exist, the error message may suggest the address of a company with a similar name (“Did you mean…?”); the suggestion is never scanned automatically. **Language.** The scan reads the language version that the website returns to it and also the entry page of the other languages the site announces (for example Dutch next to French), but it does not read every page in every language, so scan a specific language page separately if you need full coverage. **Pages that are read.** Besides pages whose address mentions sustainability, the scan reads About, Values, Mission and Ambition pages, where labels and certifications are often described. A page that does not exist (HTTP 404) is never read through a fallback method. On a very slow website the scan retries the homepage once with a longer limit and tries only the links the homepage really contains. **Where a claim was found.** Every claim is shown with the page or document it comes from and, for a PDF, the page number (for example “p. 12”), so it can be found quickly in the original. A claim that cannot be traced to one page with certainty is shown without a page number. Web pages have no page numbers. **Uploaded documents.** A document is analysed in full up to about 1,000,000 characters (roughly 400 pages). Large PDFs are read in your own browser, and only their text is sent. Anything beyond the limit is reported as not analysed. **Documents of a parent or other company.** A document hosted outside the company’s own website that names the scanned company only once or twice (for example the human-rights policy of its parent group) is analysed, but it is labelled as a group document with the name of its issuer, because it describes the group’s policy. A document that does not name the scanned company at all is not analysed as its own communication and is listed in the coverage register as excluded. In the score, claims taken from a group document count at 60% of their weight, and only every other one is counted in the number of claims. When the scan reads several language versions of a site, the same statement in three languages counts once: only the language with the most findings is counted in the score, although every finding is still shown.

Type of claim kept	Examples	Why it matters
Generic environmental claims	eco-friendly, green choice, sustainable product, conscious collection, planet friendly	Can fall under EmpCo when the claim is not clearly explained and supported in the same place.
Climate and offsetting claims	carbon neutral, climate neutral, carbon compensated, net zero product, reduced climate impact	Product claims of neutral or reduced impact that rely on offsetting are a top EmpCo risk.
Labels, badges, icons	eco label, green badge, certified sustainable, leaf/planet/recycled icons used as trust marks	A sustainability label that is not based on a recognised certification scheme or set up by public authorities can mislead.
Supplier / sourcing assurance	responsible sourcing, ethical sourcing, audited suppliers, traceable supply chain, all suppliers comply	May suggest control over the supply chain, audit quality or compliance. This must be backed by evidence on scope, coverage, method and follow-up.
Forced-labour assurance	forced-labour free, modern-slavery free, no forced labour, product traceability	Companies must be able to support such claims already under the general UCPD rules. Evidence on traceability, risk assessment, prevention and remediation may also matter for enforcement of Regulation (EU) 2024/3015, which does not itself create a separate due-diligence duty (Article 1(3)).
Aspirational / future social-performance wording	working towards a foundation for living wages, wish to build a world where human rights are respected, our ambition is...	Vague promises about wages, human rights or working conditions, with no starting point, timeline or achieved result. This is treated as a sign of possible “social washing” (presenting a company as more socially responsible than it is) on that basis alone. It is not treated as proof of how common this pattern is in any sector.
Future goals with a year	we will cut our carbon footprint in half by 2032, tegen 2028 is elke verpakking plasticvrij, d’ici 2030 nos magasins fonctionneront à l’énergie renouvelable	A promise about future environmental performance needs a detailed, realistic and independently verified plan (Article 6(2)(d) UCPD). The scan reads a sentence as a future claim when it names a year (2027 or later, or 2026 with a future verb), an environmental topic and the company itself as the subject. A legal obligation (*the EU requires…*), a result already achieved and reported, a target validated by a third party and a target stated as a percentage against a named baseline are left out. A target is not also shown as an achieved result.
“100 %” and absolute wording	100 % biodegradable, 100% recycleerbaar, 100 % naturelle, 100 % compostables	Written with or without a space, in every gender, number and language. “100% cotton”, “100% online” and “100% waterproof” are not environmental claims and are left alone.
Comparisons and own labels	greener than the leading brand, duurzamer dan elk ander merk, plus durables que, our Eco Promise logo, ons Groen Garantie-keurmerk, notre sceau Planète Verte	A comparison needs a method and the products compared (Article 7(7) UCPD). A label the company made itself, with a brand-like name, is a sustainability label not based on a certification scheme (Annex I, point 2a). A public scheme such as the EU Ecolabel or Fairtrade, and a plain logo that only happens to be green, are left alone.

4. Avoiding false alarms on social and forced-labour claims

Words such as *supplier*, *audit*, *human rights* or *compliant* appear all the time in ordinary business writing that is not a sustainability claim. Flagging every occurrence would bury the real risks in noise. A social or forced-labour match is therefore kept only if it passes all the checks below. If it fails any check, it is dropped without notice: it does not appear in the report and has no effect on the score.

Check	What it filters out
Minimum context length	A match with fewer than about 35 characters of surrounding text is dropped, because there is too little context to judge whether it is a claim.

Check	What it filters out
Neutral supplier references	Ordinary mentions such as *supporting local suppliers*, *our suppliers include…* or *become a supplier* are not kept on their own. They count only if the same passage also contains a real assurance or control term: audited, certified, traceable, forced labour, human rights or due diligence.
Requests vs. completed assurance	Wording that *asks* suppliers to do something (*we ask all our suppliers to sign our code*) is a governance step, not a compliance claim. It is flagged only if the same passage also shows that it has happened, for example a stated compliance rate, “have signed” or “audited”. A mention of “all suppliers” alone is not treated as a claim of assurance.
Future commitments checked for real evidence	A forward-looking statement about wages, human rights or working conditions (*we are working towards…*, *our ambition is…*) is flagged only when the same or the next sentence, or the rest of the **same page**, gives **no** concrete evidence of a process, such as due diligence, a complaints mechanism, a social audit programme or tracking, and does not point to a full policy or report. A commitment backed by real process detail is treated as a supported policy statement, not as empty ambition. Text that sounds like evidence but is about an unrelated topic (for example a sentence on a financial audit after a human-rights commitment) does not count, and neither does evidence that only appears on a different page.
Extra support per topic	Wording on forced labour, human rights, workplace safety and diversity/inclusion each needs an extra strong phrase in the same passage (for example *traceability* next to a forced-labour reference, or *living wage* or *worker rights* next to a human-rights reference). The trigger word alone is never enough.
Everyday assurance sentences	Besides the fixed phrases, the scan also picks up ordinary assurance sentences in English, Dutch and French, such as *we do not tolerate child labour*, *safety is our top priority*, *we champion diversity and inclusion*, *all our workers are free to join a trade union*, *we never use forced labour*, *nobody in our supply chain is forced to work*, *we pay our staff a fair salary*, *our partners are carefully selected*, *we invest in training and development* or *we support the local communities*. A sentence is read as an assurance when it names a social topic, has the form of a promise and speaks for the company (*we*, *our*) or for everyone in its chain. A risk (*child labour is a known risk*), a hedge (*we are not aware of…*), a description of a document (*our policy covers…*) and a job ad are not assurances. Such a sentence is reported **only if no evidence is given on the same page**: in or next to the sentence any figure, audit, verification, certificate, named standard, report, link, grievance channel or collective agreement; elsewhere on the page evidence that concerns the same subject (audits, a named standard, a grievance channel, a collective agreement, human-rights due diligence, safety rates, independent verification). A sentence that points to another page for more explanation (*see our report*, *lees meer in ons beleid*, *pour plus de détails, consultez…*) is not reported either. Evidence that only exists on a different page does not count. Vacancy texts, questions and sentences addressed to “you” are skipped. These findings are rated Medium and weigh less than the fixed phrases.
Same page, same medium	EmpCo asks whether a generic environmental claim is specified “in clear and prominent terms on the **same medium**” (the same advertisement, the packaging or the online selling interface; the Commission adds: next to, or as part of, the claim). For a website that medium is the page. A specification, a certification scheme or social evidence found elsewhere on the same page is therefore taken into account for green and social claims alike, and the report says so. A pointer to **another page** is not accepted as the specification of a generic environmental claim, but it is accepted for the plan and the expert findings behind a future-performance claim and for social claims, which fall under the general UCPD rules.
Evidence must belong to this claim	Evidence on the same page only counts when it can back up **this** claim. The scan ignores a figure, audit or certificate that is **negated** (*audits are not available*), that is a **discount** (*save 20%*), that belongs to **another company, brand or product**, or that concerns **another subject** or **another product or material chain** (an audit of coffee suppliers is no evidence for a claim about the cotton chain), a **bare assertion** such as *all our suppliers are fully audited* (that is itself a claim, not proof), or a **percentage that says nothing about people or sites** (*100% sustainable*) (accident rates do not support a child-labour claim; a statement about the vehicle fleet does not specify a claim about packaging). Where a page has no real page structure (a long uploaded document) only the surroundings of the claim count as “the same page”. A pointer to a report or policy only counts when it is a sustainability document, not a returns or privacy policy. The scan cannot judge whether a linked plan or report really meets the legal requirements; a person has to check that.
Not a claim about the company	Some sentences only look like a claim, and the scan skips them: consumer advice (*6 tips for choosing eco-friendly devices*), the definition of sustainability as a balance of *economic, ecological and social* factors, an expectation (*customers expect our products to become more sustainable*), a job title (*Group Responsible Sourcing Specialist*), *Zero Harm to biodiversity* (an environmental slogan, not workplace safety), cyber security, and a statement about the law (*the EU requires recyclable packaging by 2030*).

Check	What it filters out
Same page under another address	A page that is reachable under two addresses (for example with a tracking parameter such as *?zone=footer*) is read once. Its text is not counted twice and does not use up part of the page allowance.
No claim kept = no inflated score	If nothing passes these checks, the social score says “No material problematic social claim retained” instead of assuming a risk level.

These checks are deliberately cautious and are applied before scoring. They reduce noise but are not exhaustive: social or forced-labour wording that is misleading but phrased in an unusual way may be missed. An absence of social claims in the results is therefore not proof that a company’s communication is free of social-washing risk. It only means that no wording matched the scan’s criteria.

5. What the report shows for each claim

Field in the report	Meaning
Source	The web page, uploaded document or linked page where the wording was found.
Exact wording	A short passage around the claim, normally one sentence. The scan avoids mixing long paragraphs with isolated words.
Trigger phrase(s)	The specific words that made the passage relevant, for example carbon neutral, eco-friendly, responsible sourcing or forced-labour free.
Why it matters	A short explanation of the risk under EmpCo, the Forced Labour Regulation or the need for evidence.
Suggested improvement	A practical tip for rewriting the claim: state the scope, evidence, method, time period, conditions and limits.
Reusable wording	A fill-in sentence in plain language that fits the topic and type of the claim (for example supplier cooperation, energy, water, a label or a comparison). Every [bracket] shows what the company still has to fill in with its own facts. Nothing in a bracket is assumed to be true, and the sentence must be checked before it is used. The sentence is written to meet the EmpCo rules: a generic wording is replaced by one specific fact; a climate-neutrality claim based on offsetting is not repeated and funded projects are shown as a separate contribution; a future goal comes with interim targets, a published plan and an independent third-party expert who publishes the findings; a label names its certification scheme. A short note below the sentence says which rule it follows and what must be true before it is used. A broad claim about a product, range or collection keeps that subject. The sentence, the fictional example and the note are written in the language of the claim: English, Dutch or French (other languages get English).
Fictional example	The same sentence completed for an invented company in the same sector as the scanned company, only to show what a good answer looks like, in the wording of the type of claim and of the sector. It is not about the scanned company and is not a finding. Where one group of claims contains wording on different topics, each wording gets its own reusable sentence.

6. How the score is calculated

The scan gives three scores: a **Green score**, a **Social score** and a **Global score** (the overall result). They are **risk scores, not performance scores**. A higher score means a higher exposure to claim risk, or a stronger need for a legal, communication or evidence review. It does not say how sustainable a company is.

Component	Weight	What raises the score
Claim wording severity	50% (main factor)	Wording that matches EmpCo’s fixed list of unfair practices (generic claims, offsetting, labels, absolute wording), wording that promises supplier or forced-labour assurance, and several claim signals found together.
Evidence gaps	22%	Little visible support for the claim: missing scope, method, dates, verification, supplier coverage or follow-up on problems.
Negative outside context	20%	Relevant criticism, allegations, enforcement, lawsuits, concerns from non-governmental organisations (NGOs), unions or regulators, or negative press linked to the same claim area.

Component	Weight	What raises the score
Sector and channel	8% (adjustment)	Communication aimed at consumers, high-risk supply chains, or sectors where green and social claims face more scrutiny, such as fashion, food, retail, energy, chemicals and logistics. The sector comes from the official activity code when a company number is known, otherwise from how the company describes its own business. Words that only appear inside sustainability claims (for example “chemical-free” or “renewable energy”) are not used to decide the sector.

The calculation is **deliberately cautious**. A single isolated wording signal normally leads to a limited or medium concern. High or very high scores need a stronger combination of serious wording, evidence gaps, legal relevance and/or negative outside signals that were kept.

How the pieces are combined. The Green and Social scores are each calculated from the four components above. The weighted result is then multiplied by an **audience factor**: 1.0 for material aimed at clients or consumers, 0.9 for a mixed set of sources (for example a press centre with policy documents) and 0.75 for mainly investor or internal content, because EmpCo and the UCPD apply most directly to consumer communication. The result is also **capped** according to how many claims were kept, so that one or two claims cannot reach the top band on their own without outside context or an Annex I wording match. The Global score lies between the two dimension scores, close to the higher one, and is never higher than the higher of the two. This also means that the same wording can score differently depending on which pages are scanned (for example a consumer website versus a press centre).

Score band	What it means
0 – 24 Low	No material problematic claim kept, or only limited wording risk.
25 – 49 Medium	Some claim signals, wording risks or evidence gaps worth reviewing.
50 – 74 High	Strong wording risk, evidence gaps and/or negative outside signals. Review these first.
75 – 100 Very high	Reached either by several serious claim signals together with strong outside or legal context, or automatically for client- or consumer-facing material when a green claim is labelled Potentially Prohibited (Annex I) — see Section 2. For material that is mainly investor or internal/governance content, the automatic minimum is lower and usually lands in the High band.

7. Signals from outside sources

Besides the company’s own website, the scan looks for public reports by other parties, such as news media, NGOs, regulators and unions. Each result gets one of the statuses below.

Status	Meaning and effect on the score
Candidate	Found automatically, but it did not pass all checks on company match, independence, negative content and relevance. Not shown as a signal and no effect on the score.
Retained	Passed the automatic checks: it is about this company, comes from an outside source, is negative, and relates to green or social claims. It may influence the context assessment, but a person must check it before it is used outside the company.
Verified	Checked by a person for the type of source, the link to the company, the date and the relevance to the claim. This is the strongest status in the scan results.
Excluded	Company-owned sources, positive or neutral news, articles mainly about competitors, duplicates, or results with too little evidence of a link to the company or the claim. No effect on the score.

Search engines do not return exactly the same list every time. To keep two scans of the same company comparable, the answer to each search is remembered for 24 hours, so a repeat scan within that time reads the same outside sources. A search that failed or found nothing is not remembered. A scan only treats a search provider as unavailable after two failed requests in a row. Signals that were retained in an earlier scan of the same company are kept for 180 days and added to later scans, after passing the same checks again; the report marks them as found in an earlier scan. Each scan also searches the Business & Human Rights Resource Centre separately, because that site keeps case profiles per company.

8. Coverage, confidence and source status

Every page and document the scan reads gets one of the statuses below.

Source status	Meaning
Retrieved and analysed	Usable text from the source was included in the analysis (shown as “Reviewed” on the results page).
Retrieved and partially analysed	Only part of the text from the source was included in the analysis (“Partly reviewed”).
Limited text extracted	The page or document gave too little usable text for a full assessment, for example because it builds its content with scripts the scan cannot read, or because the text could not be extracted.
Retrieved but not analysed	The source was fetched, but it was not analysed because the scan reached its limit on how much text it can process.
Failed / skipped	The source could not be opened, was a duplicate, had low relevance, or fell outside the number of pages the scan reads. A page that does not exist (HTTP 404) is listed here and is not retried through a fallback text-extraction method. It does not support any finding.
Excluded as outdated	The source was retrieved, but it is dated before the screening cut-off (see below) for a company’s own communication, so it was not analysed.

Confidence shows how much of the company’s communication the scan could read. It reflects the coverage of sources, the quality of the text extraction, access failures, the use of fallback methods, whether claims were found, and whether an external search was done. It is reported separately from claim risk. A low risk score combined with limited coverage must never be read as proof that risky claims are absent. When about 40% or more of the pages could not be read (or could only be read through a fallback text-extraction method) and no claim was kept from the rest, the scan shows **Inconclusive** instead of a score, because the numbers would then only reflect a fixed starting value and say nothing about the company.

Screening cut-off for the company’s own communication. A page or document from the company’s own website is left out of the analysis when it is clearly dated before 1 January 2025. “Clearly dated” means a year next to a word such as report, annual or sustainability in the web address or in the heading of a page or the first page of a PDF, or a statement such as “last updated May 2020” at the start or end of the text. A link on a page to “our 2023 report” does not make that page itself old. Sustainability communication changes quickly, so an older report no longer reflects the company’s current claims. The cut-off applies only to the company’s own pages and documents. It never removes outside signals (news, NGO, regulator or union coverage, Section 7), which are independent reporting. A signal that is six or more years old, or that reports a closed, settled or withdrawn case, stays in the report but counts only as background in the score, and the report says so. A signal without a date is labelled “age not verified”.

9. Score example

Illustrative input	Effect on the score
Generic environmental claim aimed at consumers	Raises claim wording severity. The exact effect depends on the pattern found and the channel.
Missing scope, method and verification	Raises the evidence-gap risk.
Regulator investigation in the same claim area	Raises the outside-context risk. Several articles about the same incident count as one incident.
Sensitive sector and consumer channel	Applies a limited sector and channel adjustment.
Result	The weighted components are capped at 100 and mapped to the published Low / Medium / High / Very high bands. The example is illustrative, not a fixed list of points for every claim.

Worked example (fictional, for illustration only): a claim scores 65/100 on wording severity, 70/100 on evidence gaps, 30/100 on outside context and 40/100 on the sector and channel adjustment. With the weights from Section 6: 65×50% + 70×22% + 30×20% + 40×8% = 32.5 + 15.4 + 6.0 + 3.2 = 57.1, rounded to **57/100** (High band). This shows how the four components combine. It does not disclose the full internal point schedule, which varies by claim type, channel and the evidence found. If this consumer-facing claim were also labelled Potentially Prohibited (Annex I), the automatic minimum from Section 2 would apply instead, and the score would be at least 75/100, whatever this calculation gives. For material that is mainly investor or internal/governance content, that minimum is lower (see Section 2).

10. Limits of the scan

The scan is a structured screening and prioritisation tool. It does not decide whether greenwashing or social washing legally took place. A final assessment needs a person to review the complete communication, the applicable law, the product context, the

evidence files, the claim approval process, the language versions and the enforcement practice in the relevant country.

If a website blocks automated access, or gives unusually little text on most pages checked, the report carries a clear data-reliability warning. Under those conditions a low score may reflect limited access to the site's content rather than a real absence of risky claims, and should be treated with caution. If a website answers slowly, the scan retries a page once with a longer waiting time and reduces the number of parallel requests. Pages that still do not answer count as failed, so a very slow site can end up with a limited or inconclusive result.

The scan reads the home page and up to 10 further pages of the same website per run (up to 24 attempts, within about 35 seconds), chosen from the site's own menu, its sitemap, its language versions and a short list of common sustainability paths. A large website is therefore sampled, not read completely, and the report lists which pages were read. Pages that only exist after scripts run, pages behind a login and images are not analysed. The scan recognises wording patterns in Dutch, French and English; a claim in everyday wording that no pattern covers can still be missed, and a sentence that only looks like a claim can still be reported. Both are why a person has to check every result.

The tool is most useful before publication, a campaign launch, a website update, a packaging change, the release of a sustainability report, or the reuse of a supplier claim. It helps teams find claim passages that should be made more specific, supported with evidence, reworded or escalated.

11. Abbreviations and terms explained

Term	Meaning
Annex I	The list attached to the UCPD of commercial practices that are unfair in all circumstances (sometimes called the "blacklist"). EmpCo added new practices to it.
B2C	Business-to-consumer: a company that communicates or sells to consumers.
Directive / Regulation	Types of EU law. A directive must be put into national law by each Member State. A regulation applies directly in all Member States.
Due diligence	The process a company follows to identify, prevent and deal with risks, here mainly risks to people in its supply chain.
EmpCo	Short name for Directive (EU) 2024/825, the "Empowering Consumers for the Green Transition" Directive.
EU	European Union.
Greenwashing / social washing	Presenting a company or product as more environmentally friendly (greenwashing) or more socially responsible (social washing) than it really is.
GRI	Global Reporting Initiative: a widely used set of standards for sustainability reporting.
ILO	International Labour Organization: the United Nations agency that sets international labour standards.
NGO	Non-governmental organisation, for example an environmental or human-rights organisation.
OECD	Organisation for Economic Co-operation and Development. Its Guidelines for Multinational Enterprises describe what is expected from responsible business conduct.
Offsetting	Compensating for greenhouse gas emissions by paying for emission reductions or removals elsewhere.
Retained	Kept by the scan after its checks. A retained claim appears in the results and can affect the score.
Same medium	In the same place as the claim, for example on the same web page, label or advert.
Traceability	Being able to follow a product back through the supply chain to where it was made.
UCPD	Unfair Commercial Practices Directive (Directive 2005/29/EC): the main EU law against misleading and unfair marketing to consumers.
UNGPs	United Nations Guiding Principles on Business and Human Rights.

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