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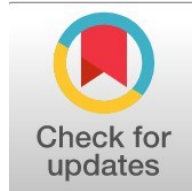
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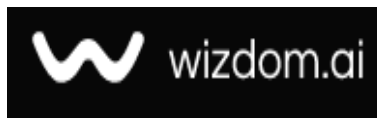
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Comparative Study of Greenwashing Practices in Consumer Protection Between Indonesia, the Netherlands, and Singapore

Helen Hervinia Hariyanto, 2210611258@mahasiswa.upnvj.ac.id (1)

Fakultas Hukum, Universitas Pembangunan Nasional Veteran Jakarta, Indonesia

Dwi Desi Yayi Tarina, dwidesiyayitarina@gmail.com (0)

Fakultas Hukum, Universitas Pembangunan Nasional Veteran Jakarta, Indonesia

⁽¹⁾ Corresponding author

Abstract

General Background: As global environmental awareness rises, corporations increasingly use sustainability claims to attract consumers, yet many of these claims constitute greenwashing that misleads the public about environmental benefits. **Specific background:** This practice undermines environmental protection efforts and erodes consumer trust, especially in Indonesia, where legal instruments addressing greenwashing remain limited. **Knowledge gap:** Previous research has explored corporate responsibility and consumer rights, but few studies have compared cross-country legal protections against greenwashing. **Aims:** This study analyzes and compares the legal frameworks and enforcement mechanisms for consumer protection against greenwashing in Indonesia, the Netherlands, and Singapore. **Results:** The findings show that Indonesia relies on general provisions within its Consumer Protection and Environmental Laws, while the Netherlands enforces binding EU directives through strong oversight institutions such as the ACM. Singapore combines the Consumer Protection (Fair Trading) Act with the regulatory authority of ASAS. **Novelty:** This study introduces a comparative legal analysis highlighting the need for Indonesia to strengthen its regulatory framework and establish a specialized supervisory body for greenwashing cases. **Implications:** The study contributes to developing more transparent and accountable consumer protection mechanisms that advance global sustainability objectives.

Highlights:

- Highlights gaps in Indonesia's legal framework on greenwashing.
- Compares consumer protection systems in Indonesia, the Netherlands, and Singapore.
- Recommends stronger, specialized oversight for sustainability claims.

Keywords: Greenwashing, Consumer Protection, Comparative Law, Sustainability, Regulation

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Introduction

As globalization advances, public awareness of the importance of protecting the environment increases. In this era, the high level of environmental damage poses a challenge for society to prevent further damage to the environment. The climate crisis is not a problem that can be solved by one party alone; it requires cooperation among the government, the private sector, and the community in creating sustainable solutions. This increased awareness, which has led to high demand and supply for environmentally friendly goods, has prompted many companies to prioritize environmentally friendly goods[1]. This has led many companies to aggressively promote their products as environmentally friendly, recyclable, and non-polluting. Consumers are trying to maintain responsible consumption behaviors by paying attention to the sustainability of the purchased products.

Many industries have begun campaigns using words such as “sustainable,” “green,” “climate neutral,” “fair,” and “recyclable” that are not actually true[2]. This phenomenon will eventually give rise to harmful practices, namely greenwashing. Greenwashing is a marketing practice where a company attempts to make claims about their products or services being environmentally friendly or sustainable, when in fact these claims are contradictory. Advances in technology have led to the emergence of new modes of operation that cause this phenomenon. This practice often attempts to create a positive image for a company by engaging in sustainability practices. In practice, manufacturers often use deceptive tactics in their marketing, attracting many consumers to purchase their products. This action certainly has a negative impact because it harms consumers who feel deceived by purchasing products that do not match the advertisements or claims, which will also have an impact on the company by damaging the reputation of the company image that has been built.

This environmental issue is certainly a problem experienced by the whole world, including Indonesia. This problem is being addressed by 17 development goals set by countries through the SDGs (Sustainable Development Goals). Using sustainable products is one of the goals of the SDGs, specifically goals 12 and 13. SDG 12 aims to create responsible consumption and production, which is contrary to the practice of greenwashing[3]. This practice hinders efforts to create sustainable consumption of a product with false claims that it is environmentally friendly, when in fact the opposite is true. This practice clearly contradicts SDG 12 because it gives a false impression and deceives consumers into believing that they are using and consuming responsibly. In addition to contradicting SDG 12, it also contradicts SDG 13, which is climate action. This is clearly evident in the Volkswagen emissions scandal (“Dieselgate”), a case of emissions test manipulation involving software with sensors that, when tested, met low emissions standards, but when driving on normal roads, emitted 40 times more nitrogen oxides (NOx). Of course, emitting such large amounts of NOx contradicts SDG number 13 because it damages the climate by indirectly damaging the environment, which affects air pollution and greenhouse gas emissions.

Consumer understanding of greenwashing practices will certainly reduce fraudulent acts committed by companies that has a negative impact on the environment. These actions certainly have adverse effects on producers, consumers, and the environment. By committing these acts, a company’s reputation will certainly decline because many members of the public will lose trust, which can lead to a decline in product sales. Consumers who feel deceived by the manufacturer also develop distrust toward products bearing eco-friendly, green, or similar labels. In this case, the environment is also affected because indirectly, the efforts previously made by consumers to improve the environment have resulted in environmental degradation because they turned out to be inappropriate[4].

In Indonesia itself, there have been several cases of greenwashing, some of which remain unresolved. Data on greenwashing cases in Indonesia is still relatively scarce, as only nine cases were found in the period from 2017 to 2021. This does not mean that there are few such cases in Indonesia, but rather that not many people are aware of them and there has been little legal action by consumers regarding greenwashing practices that are misleading or provide inaccurate information. Some examples of greenwashing practices include:

Table 1. Examples of Greenwashing Cases in Indonesia and Their Resolutions

Cases	Settlement
#BijakBerplastik campaign by one of the bottled water products focuses on reducing plastic waste, but the amount of waste produced is still relatively high[5].	Only becoming the focus of public attention and environmental NGOs regarding this issue.

There is a case regarding Nestle's claim that their mineral water products are pure life natural spring water, but this has not been proven because, according to Break Free from Plastic, they rank third in terms of plastic waste found in 317 countries[6]	Only public pressure, but no reports on the case.
The case of Green Initiatives carried out by Adaro Energy with claims of renewal and diversification of business activities to be greener in contributing to climate change, but what happened was that in Adaro Energy's annual report, it was still included in the group's DNA and the target for coal production was still large, around 52-54 million tons, which was the same as the previous year. This has led to criticism that these claims are not sustainable but rather a form of greenwashing. [7]	There has been a statement from the company's executives that what they are doing is not greenwashing because they clearly stated that the aluminum power plant is powered by coal, but this is not in line with their sustainability claims because it indirectly confirms this practice by using "green" claims or labels on products produced from fossil fuels. Furthermore, there is no proper communication strategy or transparency, so many members of the public, especially community organizations, are questioning and criticizing this.

Research on greenwashing cases is important to study in depth so that consumers become more aware and do not feel cheated. There are several global cases involving this practice. One Dutch airline company in 2024, KLM, also participated in this practice. KLM was sued by the European consumer advocacy group Fossielvrij NL in a Dutch court. The group took issue with KLM's advertising campaign promoting flying with KLM as a form of sustainable travel by using the slogan "Fly Responsibly." This is considered misleading because flying by airplane inevitably contributes to significant carbon emissions. If one wishes to fly responsibly, the action to take is to avoid flying altogether. Additionally, the Dutch government ratified the Paris Agreement in 2015[8]. This is not in line with the case because KLM's advertisement misled consumers into believing that flying would not worsen climate change, which is obviously impossible. The court decides KLM has been found guilty of misleading consumers about its products through misleading and exaggerated advertising or claims positive descriptions of sustainable fuel. Fifteen of the 19 advertising statements violated the law because they were misleading. The Dutch court ruled in favor of the plaintiff, but no sanctions were imposed. The court ruled that future advertisements or claims made by KLM must be more honest and specific[9]. There is another case in Singapore. The ASAS agency assessed that an advertisement by a Southeast Asian airline contained misleading claims regarding sustainability. This was evident in a "fuel efficiency" campaign that was deemed excessive because the phrase "environmentally friendly" was too vague.

There are several research articles that discuss this practice of greenwashing. Research conducted by Patricia Citra Dewi and Dwi Desi Yai Tarina (2024) entitled The Impact of Greenwashing Advertising on Consumer Behavior discusses the regulations that protect consumers, the efforts that can be made by consumers, and how businesses can take responsibility for this practice. This study does not discuss the rights that consumers can assert, nor does it compare regulations with other countries. Another study by Raynold Sebastian H and Muthia Sakti (2023), titled Legal Protection and Corporate Responsibility from the Perspective of Indonesian Law, discusses corporate responsibility in all its categories, including compensation, and also compares regulations, but in the United Kingdom and Australia, which is different from my research, which focuses on the Netherlands and Singapore and focuses more on the rights of consumers who have been harmed. And research conducted by Alifia Jasmine (2024) entitled Legal Review of Greenwashing Actions by Banking Institutions in Indonesia Based on ESG Principles and National Law, this study focuses more on banking practices in ESG principles, while the research that the author will conduct focuses on consumer rights protection and comparisons of countries that are not specific to economic issues[10].

Consumer protection against this practice must be safeguarded. In Indonesia, there are several laws that provide protection, such as Law No. 18 of 1999 concerning Consumer Protection. This research is an important topic because every consumer must be aware of this practice as the world continues to advance. This study aims to prevent producers from engaging in these illegal practices because their harmful effects are not limited to one aspect, but many aspects. This study focuses on protecting the rights of consumers who are harmed by harmful greenwashing practices and comparing regulations between Indonesia and the Netherlands, which is one of the countries that has experienced this case to the point of going to court. The cases in this study can serve as a basis for reference and consideration for manufacturers in Indonesia and other countries not to engage in such practices because there are binding legal regulations. This paper was written to prevent a legal vacuum in the event of greenwashing practices in Indonesia so that with the existing regulations, neither consumers nor the environment will be harmed.

Method

This article uses legal research, namely normative jurisprudence. The problem approach is a method used to better understand the problems faced and develop optimal solutions. The problem approaches used are the legislative approach, the conceptual approach, and the comparative approach, followed by approaches from several countries. This research uses a literature study method. Data analysis is defined as the effort to search for and organize the results of observations, interviews, or other findings in a systematic manner to improve the researcher's own understanding of the case being studied and to convey the findings to others. The data analysis technique used is descriptive analysis. This involves presenting data in the form of narrative text by organizing information to provide an overview of the conclusions regarding the research topic.

Result and Discussion

A. Legal Protection for The Rights of Consumers Who are Harmed by Illegal Greenwashing Practices

Consumers must be protected from their rights being infringed upon by companies through legal regulations. The Indonesian legal framework does not yet have specific regulations related to greenwashing. However, there are several regulations that cover this issue, specifically related to consumer rights protection who have been harmed. Consumers in Indonesia are entitled to legal protection because Indonesia adheres to the principle of strict liability, whereby full responsibility lies with the producer, requiring businesses to compensate for such losses[11]. Indonesia has a long history of consumer protection, as evidenced by the establishment of one of the oldest consumer organizations in Indonesia in 1973, namely the Indonesian Consumers Foundation. In 1999, Law Number 8 of 1999 concerning Consumer Protection (UUPK) was enacted as a legal framework in Indonesia, specifically regulating the rights and obligations of consumers and business actors[12]. Article 45 of Law No. 8 of 1999 stipulates that consumers may file to sue business entities through the Consumer Dispute Settlement Agency (BPSK) if their rights have been violated, or pursue litigation through the general court system[13]. Greenwashing practices can harm consumer rights are listed in the UUPK itself.

There is also the UUPK, specifically Article 4, regarding consumer rights. Article 4 paragraph (c) explains that consumer rights include the right to accurate, clear, and honest information about the condition and warranty of goods and/or services. One of the rights that is often violated by businesses is this right, which is certainly very detrimental to consumers. The practice of greenwashing, which deceives consumers with false and misleading claims about products or services, clearly contradicts this article. With this practice, consumers do not receive accurate, clear, and honest information or explanations about a product because the claims made in a company's campaign do not reflect the actual situation. Consumers clearly have the right to know accurately and honestly about the products or services they purchase and their impact on the environment in this matter. Therefore, consumers have the right to know honestly about the claims made by a company so that if the claims made by a company contradict the facts or there is no real and concrete evidence, this right of consumers is clearly violated.

It is also stipulated in Article 4 paragraph (b) of the UUPK regarding the right to choose goods and/or services and to obtain those goods and/or services in accordance with the exchange value and conditions and guarantees promised. Consumers who see claims made by a company with the label of being environmentally friendly will certainly make it difficult for consumers to choose the right product or service. The existence of sustainable and environmentally friendly claims certainly makes consumers choose products that have these claims, which are actually contradictory, so this clearly harms consumers. Furthermore, consumers are also disadvantaged because, fundamentally, products with eco-friendly claims tend to be more expensive due to more complex production processes, more expensive production materials, or other factors. This forces consumers to pay more, hoping that the products or services they receive will live up to their claims.

It is also explained in detail in Article 4 paragraph (d) that consumers also have the right to have their opinions heard and their complaints addressed based on the goods and/or services used. In this case, consumers who feel they have been deceived because the claims made by the company are not in line with reality often experience difficulties in getting a response from the business itself, resulting in consumer dissatisfaction and frustration because there is no accountable response to their complaints. Article 4 paragraph (h) clearly explains have the right to obtain compensation, damages and/or replacement if the goods and/or services obtained are contrary to what has been promised. Consumers have certainly suffered losses, both financial and non-financial. From a financial perspective, consumers experience greater material losses because they have purchased products that claim to be sustainable when in fact they are not, as well as non-financial losses because consumers feel deceived when the reality does not match the claims. Of course, this also has an impact on the company's image because it damages its reputation with many people or consumers who no longer trust the product due to misleading claims or information that does not match reality. Therefore, consumers can file a lawsuit for compensation regarding their rights that have been violated due to these actions.

Not only from the consumer's perspective, but also from the business operator's perspective, they are responsible for Articles 7, 8, and 9. Article 7(b) essentially requires business operators to provide accurate, clear, and honest information regarding the condition and warranty of goods and/or services, as well as explain their use, repair, and maintenance, so that no consumer's rights are harmed. Business operators must also be honest and fair by not using misleading claims solely to attract buyers. Article 8 also stipulates the prohibition of business actors, specifically written in paragraph (f), from marketing products or services that do not match the promises stated on the labels, tags, advertisements, or sales promotions of the goods and/or services. This practice of greenwashing involves making misleading and deceptive claims, which clearly contradicts this paragraph because business operators are prohibited from producing goods or services that do not match the advertisements or sales promotions of the goods and/or services due to misleading claims, as well as Article 9 letter k, which

prohibits offering something that contains uncertain promises.

The rights of consumers who have been harmed are protected by law under the Consumer Protection Law. In addition, consumer rights are protected by criminal sanctions or fines for business actors who violate Articles 8 and 9, with the longest time prison sentence of five years or the largest fine of Rp. 2,000,000,000.00. Business operators also have the responsibility to provide compensation to consumers whose rights have been violated, as stated in Article 19 of the UUPK, either in other forms such as money or substitute goods/services equal value[14]. This certainly makes consumers feel protected because businesses that engage in fraudulent practices will not be able to do so, meaning that consumers will not suffer losses from these companies and preventing greenwashing practices from being carried out by these companies.

In addition, consumers are not only protected under the UUPK, but also have the right to have the right to live in a good and healthy environment. Article 65 specifically stipulates that everyone has the right to a good and healthy environment, environmental education, environmental information, access to participation, and access to justice. This is certainly detrimental to consumers because consumers have the right to live in a good, healthy, and proper environment, but this does not happen due to greenwashing practices that violate these regulations. Therefore, because their rights have been violated, consumers can submit proposals, objections, reports, or lawsuits without fear because their rights are protected by the law as stated in Article 66, and they will not be prosecuted criminally or sued civilly for their reports.

Consumer protection from this act not only includes providing accurate information, but also monitoring and protecting market integrity, which strengthens the transition to a sustainable economy[15]. Strong and clear supervision is needed to prevent such actions from occurring in accordance with applicable regulations. One of the institutions that has the authority to supervise is the National Consumer Protection Agency. Consumers can report violations of their rights to the BPKN, as it is responsible for receiving and handling consumer protection complaints from the public. Dispute resolution can be carried out in two ways through non-litigation at the National Dispute Resolution Agency (BPSK) and through litigation channels via the judicial process.

It is also stipulated in Article 68 letter (a) of Law Number 32 of 2009 concerning Environmental Protection and Management, which states that every business actor is obliged to provide information related to environmental protection and management in a correct, accurate, open, and timely manner. This is certainly contrary to the practice of greenwashing itself, as this practice involves misleading or false information about the environment, particularly in terms of management, because actions that should be useful for protecting the environment actually have the opposite effect and tend to damage the environment. When it comes to airlines, this is certainly relevant to airlines that claim to use environment or eco-friendly fuel when the reality this is not the case, as they tend to use fuel that still causes pollution and contamination.

B. Comparison between Consumer Protection Regulations in Indonesia, the Netherlands, and Singapore in Addressing Carbon-Related Greenwashing Practices

The Consumer Protection Law clearly states that protected consumers are end consumers, as opposed to buyers who purchase goods or intermediary services used in everyday life[16]. The three countries, Indonesia, Netherlands, and Singapore, have an important role to play in ensuring that there are no greenwashing practices or advertisements that are detrimental to the public and consumer rights by holding businesses accountable. The three countries have different consumer protection regulations, but they take different approaches.

1. Netherlands

In the Netherlands, which is part of the European Union, the EU Consumer Protection Law and Unfair Commercial Practices Directives apply. The Dutch consumer watchdog authority takes action against greenwashing violations, such as imposing administrative fines. Regulations related to sustainable environmental claims have been clarified and detailed.

Specifically regulated in DIRECTIVE 2005/29/EC (UCPD) regarding unfair commercial practices. Article 6 on misleading actions states that commercial practices are considered misleading if they contain false and therefore untrue information, or in any way that is misleading or potentially misleading to consumers. It is also considered misleading if it causes or has the potential to cause consumers to make transactional decisions that they would not have made if the misleading or confusing claims had not been made. Of course, if this happens, then this action has violated consumer rights. In this case, greenwashing is an unfair practice because it is misleading by making false sustainability claims that do not correspond to the actual situation. Consumers are protected by their right to compensation for purchases based on misleading claims. Consumers can directly refer to the UCP Act to claim compensation for losses resulting from purchases caused by misleading information, provided that:

- a. Attribution of environmentally friendly claims that can be classified as greenwashing
- b. The causal relationship between greenwashing claims and contract termination; and
- c. Consumers must suffer losses as a result of signing the agreement

Regarding advertising marketing, it is also specifically regulated in the CDR (Code for Sustainability Advertising Code). Article 3 clearly states the prohibition of presenting misleading information, where Article 3.1 states that sustainable claims must be explained clearly, specifically, truthfully, and unambiguously. Advertisements related to sustainable claims must not contain statements, logos, images, or other signs that could mislead consumers and encourage them to purchase the product or service. This is certainly contrary to the case that occurred in the Netherlands itself, which made airline advertisements with the claim Fly Responsibly, which in Indonesian is called "fly responsibly", which is a claim that contradicts what actually happened, thus misleading consumers. The regulations regarding advertising in the Netherlands also explain the definition of

sustainable claims, stating that words such as “green,” “fair,” “responsible,” “clean,” “eco,” or “better for the environment” must be explained as clearly as possible so that consumers do not feel cheated into buying goods that contradict these claims.

ACM is one of the Dutch consumer and market authorities that plays an active role in consumer protection in the Netherlands. Regarding greenwashing practices, ACM has released five rules for companies to avoid violating sustainable claims, which could harm consumers whose rights may be infringed upon. These rules cover the use of:

1. Make accurate, clear, specific, and complete sustainability claims
2. Back up sustainability claims with facts, and always keep them up to date
3. Make fair comparisons with other products or competitors
4. Explain your future sustainability ambitions in concrete and verifiable terms
5. Ensure that claims and visual labels are useful to consumers, not confusing.

In this case, it is clear that the Dutch airline KLM has violated the regulations set by ACM by using misleading sustainability claims.

One of the most anticipated regulations is the enactment of regulations related to consumer empowerment for green transition with more binding and robust legal protection against unfair practices with better dissemination of information. With the enactment of amendments to Articles 6 and 7 of DIRECTIVE 2005/29/EC (UCPD) by adding environmental and social aspects with environmental claims related to climate neutrality or climate that is not appropriate if airlines make low-carbon claims by purchasing these products without clear evidence. With the addition of a paragraph to Article 6, which essentially makes environmental claims related to future environmental performance without clear, objective, publicly available, and verifiable commitments set out in a detailed and realistic implementation plan.

Regarding greenwashing in airline advertisements, this is implicitly regulated in several regulations, such as the upcoming implementation of the UCPD related to green transition, then the ACM authority, which has the power to file lawsuits against these actions, as in the case of KLM, and the CDR, which specifically regulates advertising regulations in the Netherlands, which clearly prohibits these false sustainability claims.

2. Singapore

Singapore's regulations also prohibit greenwashing practices. Of course, every country must protect its citizens who are consumers. This is regulated in the Consumer Protection (Fair Trading) Act (CPFTA), specifically in Article 4, which addresses unfair practices, including greenwashing. Article 4(b) stipulates that businesses are prohibited from making false claims, which is closely related to this practice. Greenwashing is a practice whereby a company makes claims that the goods or services they sell are sustainable, when in fact they are not, or in other words, makes false claims. In addition to paragraph (b), paragraph (a) also stipulates that it is an unfair practice for a provider of goods or services, in relation to consumer sales transactions, to do or say something, or not do or say something, that causes consumers to be deceived.

Consumers whose rights have been violated can sue for this practice because it is covered in Article 6 of the CPFTA. This article consists of several paragraphs explaining what actions consumers can take in relation to their rights being violated by this practice. Starting from paragraph (1), consumers can file a lawsuit in the competent court against the seller.

Not only regulated through the CPFTA, this matter is also regulated through the Singapore Code of Advertising Practice (SCAP) issued by the Advertising Standards Authority of Singapore (ASAS). Located in Chapter II (General Principles) in clause 5 regarding honest presentation, article 5.1 states that advertisements must not be misleading in any way due to inaccuracy, ambiguity, exaggeration, omissions, or other means. Paragraph 1 states that advertisements must not falsely state anything that may influence consumers' attitudes towards a product, advertiser, or promoter, which is contrary to the practice of greenwashing itself because it makes false claims to influence consumers' purchases of a product. This is particularly relevant to the purchase of airline services, as in the case of a Southeast Asian airline that launched a “Green Friday” campaign. This campaign's claims of being environmentally friendly and fuel efficient were considered misleading because not all of the airline's fleet reduced fuel consumption. ASAS requested that the claim be withdrawn because ASAS has the authority to issue sanctions by notifying the advertiser to remove the advertisement in question.

Although ASAS does not have legal force, there are consequences that greatly impact the business continuity of the company. ASAS has the authority to request that advertisers either remove or modify advertisements, withhold advertising space and time from advertisers, revoke the trading privileges of advertising agencies, publish details stating that the advertiser has violated SCAP, and refer the matter to the appropriate agency for further investigation[17]. Currently, based on the study conducted by CCS regarding greenwashing, there are five main principles that businesses must follow to protect consumers: claims must be true and accurate, claims must be clear and easy to understand, claims must be meaningful, claims must be accompanied by material information, and claims must be supported by evidence. This is so that businesses can have a clear direction for their product claims and prevent greenwashing in their product advertising services[18].

3. Differences with Indonesia

There are several differences regarding consumer protection in Indonesia, the Netherlands, and Singapore. These three countries have different legal approaches in terms of substance. In general, the Netherlands has the strongest and most stringent consumer protection laws due to amendments that specifically regulate greenwashing.

Table 2. Differences in consumer protection in Indonesia, the Netherlands, and Singapore

Aspect	Indonesia	Netherland	Singapore
Legal Basis	Not specifically regulated, relying only on the UUPK and UU PPLH. - Law Number 8 of 1999 concerning Consumer Protection, specifically Articles 4, 7(b), 8(f), 9(k), 19, 65, 66, and 45. This regulation does not specifically regulate misleading environmental claims based solely on consumer protection for consumers whose rights have been harmed by misleading information that is not explicitly specific to the environment. - Law No. 32 of 2009 concerning Environmental Protection and Management, Article 68, although this regulation is directly related to the environment, it is not clearly related to this practice.	Legal protection for consumers in the Netherlands is stricter and more binding, given that one Dutch airline has been sued in court over this practice. - EU Unfair Commercial Practices Directive (2005/29/EC) in Article 6. - Sustainability Advertising Code – CDR in Article 3, specifically 3.1, regulates advertising and advertisements related to the environment as it is the Code for Sustainability Advertising Code.	- Consumer Protection (Fair Trading) Act Article 4 paragraphs (a) and (b) and Article 6, which protect consumers from unfair practices. - Singapore Code of Advertising Practice, compiled and supervised by ASAS, stipulates that advertisements must be honest and not misleading.
Specific Rules	Indonesian regulations do not specifically address greenwashing, particularly in the carbon sector. The absence of regulations that explain and define this issue means that law enforcement in Indonesia regarding consumer protection against greenwashing practices, whether in the carbon sector or airlines, remains general and ineffective because it is still too basic.	Amendments to Directives (EU) 2024/825 specifically address consumer protection in green transition or towards a sustainable economy with better legal protection against unfair practices and better information by adding articles to Article 6 related to environmental and social aspects. The regulation clearly and specifically regulates greenwashing practices, specifically related to environmental and climate claims especially in airline advertisements, including carbon advertisements.	There are new regulations or guidelines issued by CCS regarding more specific rules in the CCS Guide on Quality-related Claims. This relates to “green” claims due to the potential for this practice, although not explicitly for carbon or in general.
Supervisory Board	There is no institution that specifically oversees consumer protection against greenwashing. - BPKN (National Consumer Protection Agency) as an agency that acts as an advisor or consultant and provides recommendations to the government for the development of consumer protection in Indonesia[19]. - BPSK (Consumer Dispute Settlement Agency) is an institution that resolves disputes through non-litigation.	It is specifically characterized by being strict and binding, and has the authority to sue business actors who provide misleading information in advertisements, which is very necessary due to the existence of a special institution, namely the ACM, which has authority and expertise in this matter.	There is no institution that specifically oversees consumer protection against greenwashing. - Advertising Standards Authority of Singapore actively monitors these practices and, although it does not have legal authority, ASAS has the power to mandate amendments or remove advertisements that do not comply with the regulations. - The Competition and Consumer Commission of Singapore (“CCS”) has actively added new provisions aimed at preventing businesses from engaging in greenwashing practices, with the goal of protecting consumers through stronger and more binding regulations specifically related to the environment.
Cases	The case of Green Initiatives carried out by Adaro Energy with claims of renewal and diversification of greener business activities in contributing to climate change, but what happened was that in Adaro Energy's annual report, it was still included in the group's DNA and the target coal production amount of 52-54 million tons, which was comparable to the previous year. This has led to criticism that this claim is not sustainable but rather a form of greenwashing.	Dutch airline KLM promotes sustainable travel through its “Fly Responsibly” advertising campaign, which makes consumers believe that they are contributing to the environment, particularly to the low-carbon economy, because of the image created by the airline that it has contributed.	Regulations in Singapore also tend to be more restrictive and stringent due to a case that befell one airline because of its “Green Friday” advertisement in November 2024[20].

In terms of regulations, the laws in the Netherlands and Singapore provide greater legal certainty because there are already strong rules that specifically regulate environmental claims, particularly greenwashing, even though they do not explicitly mention airlines or carbon emissions. However, these regulations specifically cover greenwashing by airlines and carbon emissions. Both countries have more binding regulations because there have been cases that have even been brought to court in the Netherlands. In this case, regulations in Indonesia are still relatively weak because there are no specific regulations governing this issue, relying solely on the Consumer Protection Law. The Indonesian government needs to discuss this issue because the discussion of environmental sustainability is very important, especially since there are airlines in Indonesia that have flown using SAF fuel, which certainly needs to be watched in the future to prevent similar incidents from occurring in these two countries. Several airlines involved in greenwashing in other countries have also flown through Indonesian airspace. Good corporate governance is also required of business actors or companies, which encompasses five principles, namely transparency, accountability, responsibility, independence, and equality[21].

Conclusion

The analysis conducted examines the differences in consumer protection against greenwashing practices in Indonesia, Singapore, and the Netherlands. In Indonesia, there are protections and legal measures that consumers can take if their rights are violated, as stipulated in Law No. 8 of 1999 concerning Consumer Protection and Law No. 32 of 2009 concerning Environmental Protection and Management. Consumers can sue for their rights if they feel aggrieved. Furthermore, there are several differences in the legal regulations of the three countries. The Netherlands has the strongest and most binding regulations, as evidenced by a case of carbon greenwashing involving an airline industry that was brought to court. with a more active and authoritative institution for consumer protection cases in the Netherlands. The Netherlands is also part of the European Union, which is currently aggressively pursuing sustainability, as evidenced by the amendment of a new law containing environmental and social aspects, including greenwashing practices. As for Singapore, one of the ASEAN countries that also has fairly strong and binding regulations, coupled with ASAS, which is the supervisory agency for advertising, has the authority to reprimand cases of advertising circulating in Singapore, including the "Green Days" advertisement case, which was deemed excessive and untrue, resulting in the advertisement being withdrawn. In Indonesia, there are also indications of greenwashing related to sustainability claims, but no follow-up action has been taken. Looking at several cases in the Netherlands and Singapore, these countries have strong legal powers that minimize loopholes in the regulations. Legal vacuums still frequently occur in Indonesia because the laws and regulations enforced by its supervisory bodies are still quite weak, and the regulations are still general in nature. As a result, greenwashing practices are not specifically regulated in terms of consumer protection or environmental protection, especially in the carbon industry. The lack of clarity in the regulations has resulted in many cases that cannot be resolved. Indonesia needs to add regulations and further discuss environmental regulations, especially regarding greenwashing practices, and companies must implement good corporate governance (GCG).

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