

Contents

Introduction	3
What do we mean by a regenerative agriculture claim?	4
Why have we created this guide?	5
Who is this guide for and how can it help you?	6
Key insights	7
Six key takeaways	8
A closer look at regenerative agriculture claims	9
The guiding principles	10
Elements of a credible claim	11
Putting the principles into practice	14
Dos and don'ts when making claims	15
Key challenges	16
Different types of regenerative agriculture claims	18
Overview	19
Commitment claims	20
Action claims	21
Performance claims	22
Making, managing, and reporting on credible claims	25
Defining the need, purpose, type, and scope	26
Managing claims	30
Reporting on claims	31

Role of companies in supporting regenerative outcomes		
Overview	33	
Commitments as a stepping stone to impact	35	
Actions to drive the implementation of regenerative practices	36	
From outcomes to impacts	37	
Conclusion	38	
Closing thoughts	39	
Acknowledgements	40	
Appendices	41	
Reference documents	42	
Glossary	43	
Evolving claims and reporting legislative landscape	44	
UNEP Fashion Charter: Principles for Sustainable Fashion Communication	46	
Endnotes	51	

Introduction

What do we mean by a regenerative agriculture claim?

In this guide, a regenerative agriculture claim is defined as words and/or images that differentiate a product, process, business, or service in a way that promotes some aspect of regenerative agriculture. This guide uses the term "claim" to cover both specific claims and general communications. "Claim" is used here broadly to include general written, visual, broadcast, and/or social media communications as well as particular words, images, and logos.

The Textile Exchange definition of regenerative agriculture includes the core concept that agriculture works in alignment with natural systems, recognizing the value and resilience of interconnected and mutually beneficial ecosystems versus extractive agriculture systems. The shift to regenerative practices moves beyond simply reducing negative impacts. It focuses on promoting beneficial outcomes for ecological health, social and economic equity, and animal welfare, a holistic approach that can help farmers develop more resilient systems. ² ³

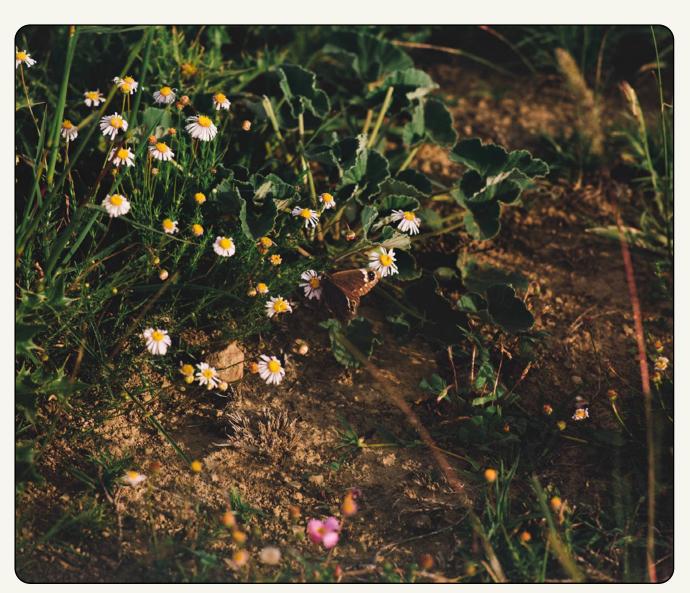


Photo: Carl van der Linde

Why have we created this guide?

Regenerative agriculture seeks to address environmental, social, and economic challenges by promoting practices that help to restore and enhance the health of natural ecosystems. The concept has gained significant attention in recent years from both brands and consumers because of increasing awareness of environmental issues and the urgent need for more sustainable farming solutions.

With the fashion, apparel, and textile industry risking disruptions to fiber production from climate impacts and biodiversity loss, a transition to regenerative agriculture is fundamental to the long-term health of the sector.

Why do credible claims matter?

Because regenerative agriculture is inherently placebased and context-specific, it does not have a single, universal definition. Therefore, making credible claims about regenerative agriculture can be challenging and requires a nuanced and transparent approach.

Making sure claims are clear, accurate, and relevant is vital to avoid greenwashing, greenhushing, and overstated claims. It also ensures that the term "regenerative agriculture" retains its credibility and meaning.

By making claims credible and aligning with best practices, including leading guidance from ISEAL Credibility Principles and UN Principles for Sustainable Fashion Communication of being transparent and evidence-based, brands can avoid reputational risks, enhance consumer confidence, and contribute to scaling regenerative systems.

This guide provides the principles, challenges, and actionable recommendations for communicating regenerative agriculture efforts effectively and authentically.

Disclaimer

Although reasonable care was taken in the preparation of this document, Textile Exchange and any other party involved in the creation of the document hereby state that the document is provided without warranty, either expressed or implied, including but not limited to, warranties of noninfringement of intellectual property and accuracy or fitness for purpose, and hereby disclaim and shall not be liable for any direct or indirect damages or losses relating to the use of this document. This is a voluntary document and is not intended to replace the legal or regulatory requirements or jurisdiction of any country or area.

There are some instances in this guide where legal implications are highlighted in terms of claims and communication. This guidance should NOT be considered legal advice—Textile Exchange recommends consulting a credible professional for legal guidance on any public-facing claims. Textile Exchange provides this general guidance in good faith as a service to the industry and is not liable for any negative consequences that may be associated with the use of this guidance or any interpretation of its contents.

Who is this guide for and how can it help you?

This guide is primarily aimed at brands, although we believe that producers and other stakeholders working within regenerative agriculture systems may also find it useful.

This guide does not directly address assured claims.⁴ Programs directly engaged in verification (such as certification schemes) may see this guide as a resource for broader alignment of their own standard system's rules and policies with the principles, but they should refer to ISEAL or their own oversight system's requirements.

The *principles* included are equally applicable to credible marketing and product claims. The *guidelines* are focused on marketing and communication claims. Product claims need to follow the guidelines of the regenerative agriculture scheme being used. ⁵ Credible schemes should have documented claims guidelines, policies, and procedures for product claims to ensure claims are clear, accurate, and relevant and are backed by systems that are transparent and robust.

There is not a "one size fits all" approach to claims and communications, particularly for regenerative agriculture. This guide is structured to provide companies with context, rationale, and understanding of the challenges around regenerative agriculture claims, and provide a set of principles and guidelines for making credible claims about regenerative agriculture. It's intended to ensure the integrity of regenerative agriculture by not diluting the concept. The guide aims to provide best practice to support companies in making effective and credible regenerative claims to secure trust and build value for the brand, sector, and concept of regenerative agriculture.



Photo: Carl van der Linde

Key insights

Six key takeaways

Regenerative agriculture claims vary in scope and type

The three types of claims focused on here are:

- Commitment claims that publicly declare a transition to regenerative practices.
- Action (practices) claims that focus on the specific steps being implemented, such as partnerships and farming methods.
- 3. Performance (outcomes) claims which demonstrate measurable progress toward regenerative goals.

As claims progress from commitments to actions to performance, the complexity of the information required to make them credible increases

While all claims must be able to evidence their credibility, performance claims demand independent verification and measurable data to ensure trustworthiness.

For claims to be credible, they must be clear, accurate, and relevant, and supported by transparent and robust systems

Transparency and evidence strengthen credibility and make sure claims reflect actual impact rather than intentions. It may not always be possible to include all qualifying information within a claim itself, but supporting details should be easily accessible, understandable, and clearly linked.

All regenerative agriculture claims must be measured and verified

The lack of a universally accepted definition of "regenerative agriculture" leads to varying interpretations and the risk of misleading claims. Without clear parameters, companies may unintentionally misrepresent their efforts. Greenwashing—exaggerating sustainability impacts—and greenhushing—staying silent to avoid scrutiny—both undermine transparency and consumer trust. Despite the complexities often involved, verifying and measuring regenerative outcomes is essential for maintaining credibility.

Regenerative agriculture must include the measurement of performance outcomes

While action-based claims—such as using cover cropping or no-till farming—are valuable, they only indicate what is being done, not what impact is being achieved. It's our view that regenerative agriculture systems should include the measurement of outcomes (performance claims), such as improved soil health, biodiversity, or carbon sequestration, rather than assuming that implementing practices (action claims) automatically leads to these benefits. It is critical to avoid equating adherence to regenerative practices with verified environmental impact.

Brands must align with both local and international consumer protection laws to ensure compliance with evolving regulatory landscapes

Global regulations, such as the EU Green Claims
Directive, are increasingly requiring stricter standards
to prevent misleading sustainability claims. Adhering
to these legal frameworks is essential for maintaining
credibility and avoiding reputational and legal risks.

The essential credible regenerative agriculture claims checklist Commitment claims: Include time-bound and measurable targets. ☐ Define scope clearly (e.g., geography, materials). Avoid implying that outcomes have already been achieved. Link to detailed plans for achieving goals. Action (practices) claims: Specify actions and their intended outcomes. ☐ Include partners, certifications, or programs involved. Avoid overstating the link between actions and outcomes. ☐ Incorporate monitoring or verification processes. Performance (outcomes) claims: Clearly define achieved outcomes (e.g., "20% increase in soil carbon"). Provide evidence through robust data and independent verification. Acknowledge limitations and areas for improvement. Use qualifying language (e.g., "contributed" to" versus "caused") to avoid overclaiming and better reflect the collective and incremental nature of progress.

A closer look at regenerative agriculture claims

The guiding principles

The following outlines the fundamental principles for making credible claims, including claims related to regenerative agriculture. ⁶ These are applicable irrespective of:

- the regenerative agriculture program, tool, framework, or standard
- intended goal, targets, or outcomes
- geography
- · agriculture system or product

Based on the ISEAL credibility principles and various ISEAL claims guidance, claims should follow the principles outlined in Figure 1.7 Legislation underscores this with requirements for transparent, science-based, substantiated, and verified claims.



Claims should be **clear**, **accurate**, and **relevant**, and backed up by systems that are **transparent** and **robust**.

General rules of thumb when making regenerative agriculture claims:

- Claims and communications should be made consciously and genuinely and only when information is in place to substantiate claims.
- A robust measurement, verification, and reporting mechanism should be in place that generates evidence and data to back up claims.
- Claims are strengthened by the disclosure of supporting information that substantiates the content of the statement.
- Statements are more credible if the strategy of the organization is clear.

Alignment with key principles

The claims principles in Figure 1 are in line with the fundamental principles of the United Nations Environment Programme (UNEP) and the International Trade Centre's <u>Guidelines for Providing Product Sustainability Information</u>: "Communicators should be thinking about reliable, relevant, clear, accessible, and transparent information."

These principles are also in line with the ISO Technical Specification ISO/TS 17033 "Ethical claims and supporting information—principles and requirements" of reliability, transparency, and relevance. Additional principles include the involvement of interested parties and equity.

While framed slightly differently, these principles also align with the UNEP's <u>Sustainable Fashion</u>

<u>Communication Playbook</u> foundation Lead with Science:

Principle 1: Commit to evidence-based and transparent communication efforts and Principle 2: Ensure information is shared in a clear and accessible manner.



Clear

Communications should be easily understood, in plain language, and free from misleading information. The limits of the claim should be clearly stated.



Accurate

Statements should be truthful, based on substantiated evidence, and an accurate interpretation of that evidence.



Relevant

Communications should be about an issue that is material or significant to the product or business and not a distraction from more important issues. Claims are related to, and proportional to, actions taken. They are contextualized with a clear scope. They should go beyond legality.



Transparent

Information is easily, freely, and publicly available about the claim, its scope and verification (if applicable), and any evidence to back it up.



Robust

There is a robust system in place that controls when claims can be used and by whom, and clear criteria are to be met before any statements may be made.

Figure 1: Claims principles (adopted from ISEAL Challenge the Label)

Elements of a credible claim

To maintain stakeholder trust and avoid greenwashing, all regenerative claims should follow the basic principles in Figure 1.

To ensure claims are clear, accurate, and relevant, all claims should:

- Say what the claim applies to and any limitations, for instance, if it applies to only specific geographies or materials
- Outline the scope of the regenerative agriculture program or tool
- Describe who is involved, including partners and funders
- · Detail the scale and type of change intended
- Include a timebound statement or reference the time frame

As claims move from action to performance claims, it becomes increasingly relevant that they are based on a transparent and robust system. Claims should be supported by:

- Information/evidence to substantiate the claim
- Clear causal pathways linking commitment to action to performance
- Contextualization (especially avoiding highlighting only the positive aspects unevenly)
- Regular monitoring to ensure their relevance, accuracy, and compliance with evolving regulations
- Information on the method of verification and level of independence
- Clear access to easily understandable supporting information (e.g., via website or reports)

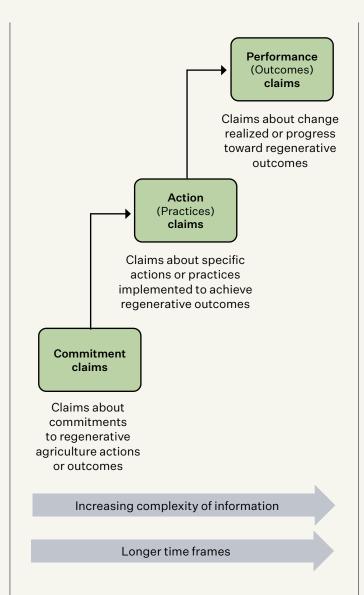


Photo: Carl van der Linde

Elements of a credible claim

Verification

Some brands seek independent verification of their supply chains and/or monitoring data (such as certification programs). See Figure 3 on levels and types of verification. The extent and depth of evidence needed for verification depends on the type of claim being made and the intended audience.

Claims need to be supported by a system to verify the accuracy of the claim and the supporting evidence. Examples range from self-verification to third-party assurance. The method of verification should be publicly accessible and fit for purpose based on the level of proof needed for credibility.

Consumer-facing product claims and labeling require particularly transparent and robust systems, underpinned by verified data. Certification schemes with independent third-party assurance provide an efficient way for brands to do this. Brands that rely on such systems should work closely with their certification partners to ensure credible claims are designed in alignment with the scope of verification. This includes having transparent, defined rules for making on-product claims.

Brands should consider whether they are subject to any sector- or product-specific claim verification requirements and ensure they comply with them, as well as their obligations under general consumer protection law. Many countries regulate consumer claims, so brands must ensure that product and labeling claims comply with any regulatory requirements or restrictions for the applicable jurisdiction of production and product placement.



Figure 3: Types of verification

Elements of a credible claim

Verification with third-party assurance is generally considered more credible due to its independence. However, it's important that those making claims conduct due diligence on the expertise and credibility of the systems behind it. One driver of the evolving greenwashing legislation in the European Union (EU) is the varying degrees of transparency and rigor of sustainability labels, particularly in terms of third-party assurance. Sustainability standard schemes are diverse and have varying levels of effectiveness and transparency related to their governance, monitoring systems, and complaint mechanisms. The evolving EU legislation is anticipated to wean out less robust schemes.

Claim makers relying on certification to assure the accuracy of information within their claims should closely examine the certification schemes themselves, including through the lens of the requirements set out in various new and proposed EU legislation on transparency and credibility.

EU Legislation—key points related to claims

The Empowering Consumers Directive, adopted in March 2024, includes the introduction of minimum criteria for certification to increase the transparency and credibility of labels:

Before displaying a sustainability label, the trader should ensure that, according to the publicly available terms of the certification scheme, it meets minimum conditions of transparency and credibility, including the existence of objective monitoring of compliance with the requirements of the scheme. Such monitoring should be carried out by a third-party whose competence and independence from both the scheme owner and the trader are ensured based on international, Union, or national standards and procedures, for example by demonstrating compliance with relevant international standards, such as ISO 17065 'Conformity assessment.'

As well as credibility and transparency expectations (Amendment (1) (b) (r)):

"Certification scheme" means a third-party verification scheme that certifies that a product, process, or business complies with certain requirements, that allows for the use of a corresponding sustainability label, and the terms of which, including its requirements, are publicly available and meet the following criteria:

- (i) The scheme is open under transparent, fair, and non-discriminatory terms to all traders willing and able to comply with the scheme's requirements
- (ii) The scheme's requirements are developed by the scheme owner in consultation with relevant experts and stakeholders
- (iii) The scheme sets out procedures for dealing with non-compliance with the scheme's requirements and provides for the withdrawal or suspension of the use of the sustainability label by the trader in case of non-compliance with the scheme's requirements
- (iv) The monitoring of a trader's compliance with the scheme's requirements is subject to an objective procedure and is carried out by a third-party whose competence and independence from both the scheme owner and the trader are based on international, Union, or national standards and procedures.

Putting the principles into practice

This section summarizes how to apply the principles while addressing challenges specific to regenerative agriculture claims. Some simple examples of claims are highlighted. These should not be seen as exhaustive and should be considered with the principles outlined in this guide and information requirements.

Principle	Challenge	What does that mean in terms of claims?	
Clear	No universal definition	 Qualify what definition and scope of regenerative agriculture you are using in your claim and reference any specific framework or program specific to supporting the claim Name any verification/certification system used with links to accessible additional information on that program including what the scope of regenerative covers Be transparent—provide accessible additional information 	
	Lack of (standardized) data	 Use verified data with public information on the verifier and accessible methodology Be transparent on data and information evidence 	
Accurate	Risk for brands to make claims for specific indicators with no standardized procedure/methodology for outcome measurement and monitoring	Use standardized public frameworks such as the Textile Exchange Regenerative Agriculture Outcome Framework and clearly reference sources	
	Attribution versus contribution	 Use clear language, not overstating your role Use contribution claims and highlight collective action and contributing partners 	
	Absolute values of data may be misleading or hide tradeoffs	Consider the relative value of outcomes, not just absolute values. For example, for carbon, the analysis should consider the quantity of carbon emissions versus the quantity of fiber produced. The emissions, by themselves, are not enough if the yield/productivity of the land is not good, because it would be necessary to farm larger areas	
Relevant	Regenerative sourcing may only be a small proportion of overall product or business	 Contextualize the claim with a clear scope—including proportionality Do not cherry-pick and be transparent about any limitations 	
Transparent and robust systems	Traceability and verification systems to support regenerative product claims are limited	 Leverage existing assurance and traceability mechanisms Ensure systems are in place/invest for outcome data and claims 	
	Outcome monitoring and verification system represents an additional cost that may fall disproportionately on farmers	 Leverage credible third-party standards, certification programs, and tools Collaborate and establish partnerships to share data 	

Dos and don'ts when making claims

Be clear

- **Do** qualify how regenerative agriculture is being defined—what aspects or outcomes are in scope.
- **Do** be specific about the limits of the claim:
 - The type of claim—commitment, action, or performance.
 - Scope—of the product, company, geography, and sector that the claim applies to.

For example:

"We have partnered with ABC to provide the upfront investment of \$250k over a period of three years with farmers in Argentina to support the regeneration of three million hectares of land. Find out more: [Link]"

- Don't make broad generic statements about regenerative agriculture.
- Don't use statements that are vague, unspecific, or not timebound. For example:

"We are committed to partnering with farmers and input companies to support regenerative agriculture practices."

Be accurate

Don't use statements linking certification and impact without evidence. For example:

"We have improved the environment because we source [program or scheme] certified which means we are building soil health."

- Don't use statements implying that certification is a guarantee of specific performance.
- Don't use outcome claims that are not backed by scientific evidence based on international standards.
- Don't use regenerative and certified/verified interchangeably. Regenerative is a broad term and certified/verified means having been assessed as in compliance with a specific standard. For example, don't say:
 - "We source rubber from regenerative farms."
- O Do say, for example:

"Last year, we purchased a total of [X] tons of natural rubber, and 75% was independently verified as regenerative by [program or scheme (with a link to publicly available scheme documents: Governance, standard, verification methodology, and claims policy)]. We commit to purchasing 100% verified regenerative [program or scheme] or link to qualifications by 2027."

Be relevant

Do say, for example:

"We source one of our key ingredients, rubber, from verified/certified [program or scheme] farms as part of our commitment to 100% verified regenerative by 2027."

Here, the reference to SCHEME should include public links to additional information including the scope of how regenerative is defined in that system.

Or do say, for example:

"We support/encourage regenerative agriculture by purchasing [program or scheme] certified/verified cotton/rubber."

Key challenges

Claims are often used as part of a concise promotional message. However, the simplicity and marketing focus of such messages makes them vulnerable to being unintentionally or intentionally misleading if not carefully formulated and substantiated. Getting it right, while addressing some fundamental challenges, is critical.

Some of the key challenges are:

A lack of a clear definition of regenerative agriculture

The underlying challenge with regenerative agriculture claims lies in the absence of a universally accepted definition and its inherently place-based and context-specific nature. This can create confusion among stakeholders, who may misunderstand what the claim covers or assume it addresses priorities that it may not cover. It could also lead to misinterpretation or misleading claims. Vague or inflated claims may not be intentional but can occur when there is a lack of agreement on terms or true scientific understanding.

In practice, regenerative agriculture can look very different depending on the context—even within a single framework. It can be applied globally across any land-based production system, including cropping, grazing, and agroforestry. Implementation, however, can cover a wide range: Some focus narrowly on specific agroecological aspects, like soil health; others include specific social dimensions such as farmer resilience; and some, like Textile Exchange's Regenerative Agriculture Outcome Framework, take a comprehensive approach by integrating ecological health, social and economic equity, and animal welfare. Because it's highly context-specific, success requires a focus on outcomes alongside practices, with no one-size-fits-all approach to implementation.

What makes an agricultural system regenerative?

Released in January 2022, Textile Exchange's Regenerative Agriculture Landscape

Analysis drew on extensive research and interviews to establish that regenerative agriculture is inclusive of the following:

- An agricultural approach aligned with natural systems, emphasizing interconnected and mutually beneficial ecosystems over extractive methods.
- The recognition that Indigenous and Native Peoples have used this approach to growing food and fibers for centuries and the need to incorporate social justice.
- A holistic, place-based, outcome-focused systems approach rather than a "onesize-fits-all" checklist of practices.

Greenwashing



Greenwashing is defined as misrepresenting actual sustainability practices or activities to promote a false image of responsibility.

As regenerative agriculture and other responsible alternatives to extractive farming have become popular selling points, vague and exaggerated claims have increasingly appeared in advertising, marketing, media, packaging, and beyond. Misinformation and greenwashing are ubiquitous and a significant challenge.

A 2020 study by the European Commission found that 53.3% of environmental claims communicated in the EU were vague, misleading, or unfounded.⁹ A fashion sector-specific report found 60% of sustainability claims by European fashion giants are "unsubstantiated" and "misleading."¹⁰

As consumers increasingly prioritize and demand more sustainable fashion products, greenwashing has proliferated to meet this demand and differentiate products in a crowded market.

Using "regenerative" in claims

Most regenerative agriculture tools and programs emphasize rebuilding, restoring, and the interconnectedness of systems, yet they vary in scope. While there is a shared vision, no single approach applies universally. Consequently, claims about regenerative agriculture depend on various factors, including local context and landscape, specific practices, and intended outcomes.

If using the term "regenerative" in a claim, it's important to provide descriptive language that clearly defines the meaning and scope of regenerative agriculture as it applies to that claim. This helps provide clear interpretation to avoid misleading interpretations on scope.

Claim makers need to strike a balance: Providing enough information to avoid ambiguity without overwhelming details that could confuse the audience.

Key challenges

At worst, this greenwashing consists of "unscientific methods and selective implementation" designed to mislead or confuse consumers. It may also result in a brand promoting a niche line, while business as usual continues with the rest of the company and within its supply chain.

Misleading or poorly substantiated claims can lead to mistrust, legal implications, and reputational damage, not only for the organization but also for the broader sector. This could unintentionally lead to increased skepticism about the concept of regenerative agriculture.

Governments around the globe are stepping up with legislation and guidance to address greenwashing to protect consumers and ensure transparent practices in the marketplace. This creates additional challenges for companies seeking to communicate their sustainability efforts—such as the use of regeneratively grown materials and products—while navigating the uncertainty of a rapidly evolving legislative landscape.¹²

This shifting landscape reinforces the need for clear guidelines on claims. Many sustainability and regenerative agriculture programs and standards are already updating their procedures to align with upcoming EU regulations, and are focusing on raising awareness among upstream suppliers, particularly in the food sector. See appendix: Evolving claims and reporting legislative landscape for more details.

The EU's evolving greenwashing legislation

The European Union has been at the forefront of combating greenwashing. The EU's Green Deal is a package of policy initiatives that includes the Empowering Consumers for the Green Transition Directive (ECD), and the European Union Green Claims Directive (GCD). Together, these two directives will create a single regulatory framework to provide common criteria against greenwashing and misleading environmental claims.

Empowering consumers for the Green Transition Directive

Adopted in March 2024, this directive aims to help consumers make informed green choices by providing reliable information about products and services. It also aims to protect consumers from unfair green claims and improve their knowledge of product repairability. EU countries are required to transpose the directive into their national law by 27 March 2026. The rules will apply from 27 September 2026.

European Union Green Claims Directive

Proposed in March 2023, this directive aims to address greenwashing by establishing clear standards for companies to substantiate their environmental claims. While not finalized, it would regulate certain environmental claims, in particular voluntary environmental business-to-consumer claims. The GCD will require companies to use scientific evidence for substantiation, and to verify claims independently.

Greenhushing



Silence is not a solution. Greenhushing, or choosing to go silent to avoid greenwashing claims, reduces transparency and incentives.

Brands have the opportunity to raise consumer awareness and interest in regenerative agriculture so that consumer purchasing habits support the scaling of regenerative systems. However, greenhushing, the deliberate decrease of external communication, is on the rise. This is because of the concern or fear of making erroneous claims and receiving backlash, the uncertainty around legislation, and the lack of guidance on credible communication.

Some companies are purposely keeping quiet about their sustainability goals and efforts, even if they are well-intentioned or plausible. This reduces transparency and makes it hard to differentiate leaders from those lagging behind, reducing incentives and even leading to decreased public trust. Uncertainty also exists because of the lack of standardized methodologies for measuring outcomes, leaving brands vulnerable to exposure when transparently communicating data. Even when progress is not being made, transparency on challenges and ways forward is critical.

Different types of regenerative agriculture claims

Overview

Regenerative agriculture claims vary in complexity, credibility, and the level of substantiation required, depending on whether they focus on commitments, actions, or performance outcomes. These claims—aligned with ISEAL's credible living wage claims framework¹³— range from broad corporate commitments to regenerative principles, to specific actions taken within supply chains, and ultimately, to measurable improvements in soil health, biodiversity, and farmer livelihoods.

As claims move from commitments to action/practices and performance/outcomes, there is an increasing complexity of information needed to support evidence-based claims. This means the need for transparency, substantiation, and verification increases. These claim types are also not mutually exclusive. Brands that take a holistic approach should ensure that commitment claims are directly linked to tangible actions and measurable performance outcomes, providing transparency through accessible supporting information and verification mechanisms.

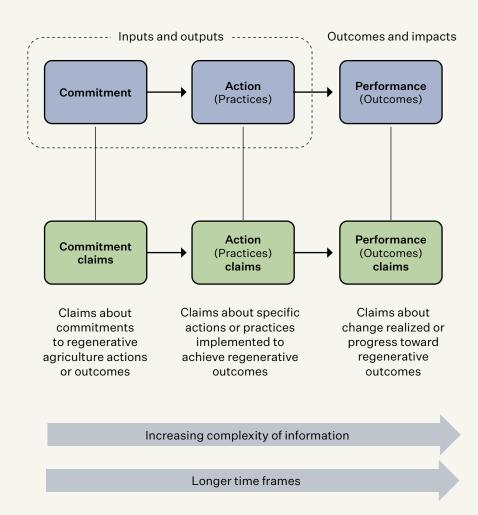


Figure 4: Typology for classifying regenerative agriculture claims

Commitment claims



Commitment claims are statements made by organizations regarding their commitments to regenerative agriculture actions or performance. These commitments should be authentic and embedded in the organization's strategy. Commitments with clear goals provide the foundation for effective company action to achieve beneficial outcomes.

Company commitment claims should:

- Specify who is making the commitment (company/brand or collective action)
- · Specify who and what will be changed
- Outline the scale of the change
- Include time-bound sets of actions to achieve the commitment
- · Set out clear targets and intended results

Time frames for future targets should allow accountability to stakeholders. Common practice is at least five years into the future, but no more than 15. Longer-term targets—such as the year 2050—should include defined interim targets. Targets can be strengthened by using global reference points and targets for relevancy and to give a better idea of the magnitude of the individual commitment. For example:

"We aim to reduce absolute GHG emissions across our value chain by more than 50% in line with a 1.5°C trajectory by 2030, from a 2016 baseline. We are working to achieve net-zero emissions by 2040, one decade earlier than called for in the Paris Agreement."

Commitment claims may look very different. Some public commitments cover multiple scopes and materials, such as:

"By 2025, we will achieve at least 75% sustainable materials for our products, including fibers, that are recycled, renewable, regenerative,* sourced responsibly,** or some combination thereof, and/or are manufactured using low-resource processes."

-Global clothing brand

*Link to further qualifying language of how this is defined:

"Product is considered regenerative when the adoption of regenerative agriculture practices results in quantified improvements across at least two of the environmental outcome areas and is independently verified through a third-party standard."

**Note: Terms such as "sustainable" and "responsible" may be considered too generic with no clear understanding. For terms without universal definitions, including regenerative agriculture, it's important to set and define how the term is being used in the claim.

While other commitments may be linked to specific outcomes:

"We set the target to increase soil carbon by 25% in our operations over the next 40 years with a net carbon footprint of zero."

—Farm cooperative

"Reduce greenhouse gas emissions by 50% per tonne of cotton lint produced by the end of the decade."

-Global NGO

For public commitments, checking beneath the headlines on actual targets and dates is important for accountability on progress. Achieving real change requires longer-term commitments. A trust gap can be created when companies commit to long-term targets decades away but don't establish or communicate goals or a strategy for action. Intermediate milestones or key performance indicators should be set with ongoing monitoring and reporting of progress.

Additionally, the scope of commitments should be meaningful. In a broader example, a clothing brand with a GHG emissions reduction target that only covers Scope 1 and 2 emissions but excludes Scope 3 emissions would not be considered credible, as Scope 3 emissions are typically where the vast majority of GHG impact is occurring. For regenerative agriculture claims specifically, the scope of what is covered by the commitment should be clearly stated.

The nuanced and contextual nature of regenerative land management—together with external factors such as unexpected drought—can influence expected results, even when everyone is fulfilling their responsibilities. Companies should be transparent about what's happening in their projects and talk about things that did not go as well as expected (and the reasons) as well as the positive outcomes.

The EU Empowering Consumers Directive notes that credible future performance claims (i.e., commitments) must be supported by clear, objective, verifiable commitments and targets, with a clear implementation plan, financial resources to support it, and an independent monitoring system.

Action claims



Corporate commitments are a positive start, but they need to turn into action. Action claims are about specific actions, investments, and practices implemented to lead to positive regenerative agriculture performance. The actions support and incentivize the implementation of regenerative practices while creating the right environment to drive change.

If commitment claims are made, there should be a link to specific actions to meet the targets as part of the implementation plan. There should not be empty promises or contradictions between commitments and actions—actions should be meaningful and genuine. Crucially, it's vital to maintain a clear distinction between stated ambitions and actual actions. Intended actions are commitments and fall under commitment claims.

Action claims should include the description of the scope, scale, intended change, and the timing of the actions. In addition, the claims should be supported by:

- Links between the action(s) and intended performance outcomes/impact
- Contextualized reference points to ensure relevance (material)
- A list of co-funders and partners involved in the actions
- Details of the monitoring system for tracking and reporting
- The verification of data, if applicable
- Publicly and easily accessible information (e.g. website, reports)

The most common action claims across the industry are investments to support the transition to regenerative agriculture and meet regenerative sourcing commitments. These investments typically cover compliance-related changes, premium payments, and/or sourcing policy requirements to share risks and rewards with farmers. These types of commitments and actions to regenerative sourcing are often reflected on company websites and sustainability reports.

"\$800,000 USD paid in premiums to our regenerative farming partners in India and the U.S. to help fund the transition to regenerative farming practices and cover third party certification through ABC standard and cotton through Regenerative Organic Certification."

—Global textile brand



Photo: Carl van der Linde

Performance claims



Performance claims focus on progress toward, or achievement of, specific regenerative outcomes and/or impacts. While claims about regenerative outcomes and beneficial impacts can be the ultimate goal for companies committed to regenerative agriculture, these are often the most difficult claims to make credibly for several reasons.

Regenerative agriculture outcomes are often at the ecosystem level and require longer time frames, with many different partners and stakeholders in different roles, all contributing to and influencing the outcomes and impacts in some way. Therefore, measuring outcomes (performance) is difficult. The context of regenerative agriculture is also dynamic and complex; outcome metrics and methodologies that are appropriate and feasible can vary widely across production systems and geographic regions.

This makes it particularly challenging to make credible performance claims that are:

- Clear, using plain and accessible language to explain highly technical research and methodologies, including their limitations and assumptions.
- Accurate, supported by science-based data, and truthful, verifiable interpretation. The lack of agreedupon measurement methodologies creates barriers to comparing, sharing, and aggregating data, resulting in patchy and limited outcome data.
- Relevant, with a focus on material issues and actions, backed by statistically rigorous analysis and a clearly defined, contextualized scope.

 Robust, with strong monitoring and verification systems that are transparent and reliable.

The challenges noted earlier—such as regenerative agriculture's context-specific nature—are further complicated by challenges specific to making claims about performance, especially in terms of providing sufficient evidence for proof. Performance claims are subject to higher scrutiny (and skepticism) by stakeholders.

Technical considerations

Collecting, documenting, and analyzing science-based evidence to back a performance claim about specific outcomes is technically complex and requires upfront planning and investment. There is a direct link between the rigor of the methodology and what claims can be made. The minimal information needed to back up performance claims includes:

- Research methods used such as interviews, case studies, quasi-experimental, or random control trials
- Information on the indicators and methodology
- Who collected the data and analyzed it (e.g., self-reported, internal staff, external)
- How the data was collected and verified
- When the data was collected, baselines, and timing of the change
- Data quality and quantity (sample size, if applicable)

Credible, verifiable data has improved with technology, but there are still big gaps. With no uniformly applicable set of regenerative outcomes, there is limited compatibility and comparability of data across companies or sectors as each initiative will have its own unique needs and goals. Baseline data may not be available. And with longer time frames, it's important to determine what data to



Photo: Carl van der Linde

Performance claims

get, and when, years before changes may be evidenced. Establishing a baseline is fundamental for tracking progress in any regenerative agriculture framework. While baseline data may not always be readily available, the first measurement captured should be treated as the baseline. This provides a reference point for evaluating changes over time and ensures that reported progress is based on measurable and objective comparisons.

Communicating clearly and accurately about data on specific indicators (such as soil health) can be challenging when methodologies are not standardized. Sector-wide common measurement and reporting frameworks are emerging to address some of these challenges, such as Textile Exchange's Regenerative Agriculture Outcome Framework (see Figure 6). Evidence requirements will also be dictated by legislation in specific jurisdictions, such as the European Union legislation mentioned earlier, or the United States Federal Trade Commission Green Guides.

Methodological considerations

Attribution versus contribution: Taking credit for change

Establishing a direct causal link between a company's activities and observed outcomes is challenging— especially when many factors are simultaneously influencing the results. This makes it difficult to isolate the specific impact of a single company. Such challenges are at the heart of what is known as causality or attribution.

- Attribution implies that an outcome occurred solely as a result of a company's actions.
- **Contribution** recognizes that a company's efforts were one of several factors that led to a desired change.

Unless the intervention is contained and discrete, outcomes will almost always result from a mix of influences, many beyond the company's control.

Attribution claims

Claiming sole credit for specific performance or outcomes requires investment in rigorous research design, including data from farmers who didn't participate in the intervention to serve as a valid comparison group. Methods such as random controlled trials and quasi-experimental research designs may support organizations to use language such as "as a result of," "caused," "lead to," and "increased/decreased" when making claims. However, these studies are typically long-term and expensive. The results will also be specific to the context of the study, meaning drawing conclusions about broader impact may not be meaningful or credible.

Because of the holistic nature of regenerative agriculture, the interventions are likely multidimensional involving multiple stakeholders. In this context, brands have a real opportunity to make contribution claims as part of broader collective action. Using qualifying language such as "contribution to" helps ensure outcome claims remain accurate and proportionate, avoiding the risk of overclaiming. It's important to describe the role of others involved in the change. And regardless of the qualifying language, these claims still need to be backed by research and data that make clear links between the actions and outcomes.

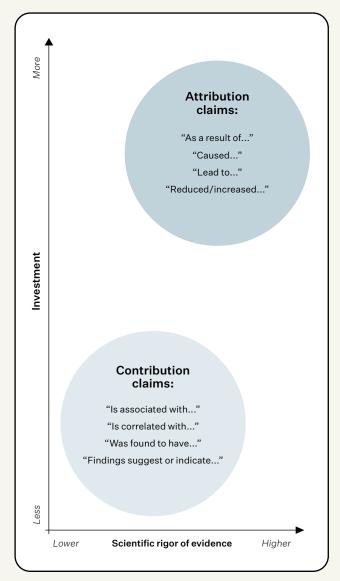


Figure 5: Taking credit for change

Performance claims

"Our investments in cover crops in our oat sourcing region have contributed to reduced emissions by 25% from 2019–2022. Find out more here: [link to the scientific peer-reviewed study]"

See the section: <u>Defining the need, purpose,</u> type, and scope Step 3 for more information on making credible collective claims.

Attributing specific actions by specific actors to specific regenerative outcomes can be challenging, especially for broader or long-term impacts. However, attribution claims may be feasible for smaller interventions or outcomes where there is a clear, direct correlation between the action and the result.

In general, performance claims must reflect the rigor of the research design and acknowledge any limitations. This includes recognizing the lack of conclusive evidence and using cautious language, such as "findings suggest" or "findings indicate." Because of the complexity involved, attribution claims typically require greater investments and more rigorous research methodologies.

Mitigating the challenges

Some of the technical challenges in obtaining reliable outcome data can be partially mitigated by using publicly accessible tools that offer standardized indicators with documented methodologies. This includes the Textile Exchange Regenerative Agriculture Outcome Framework (see Figure 6), which is specifically tailored to the fashion, apparel, and textile industry. There are other regenerative agriculture outcome frameworks developed for the food and beverage sector, such as SAI Platform's Regenerating Together framework.

It's important to note that these two frameworks have distinct outcome scopes that need to be made explicit in any claims. Both are science-based and designed to be flexible for context-specific applications. Built through a consensus process, they create a shared understanding and language around meaningful and measurable regenerative agriculture outcomes. This reduces investment costs for companies in developing their systems and enhances interoperability within and across supply chains. Common frameworks are designed to build alignment, minimize duplication, and support implementation.

Publicly available, sector-wide common frameworks support the principles of credible claims to be:

- Clear: Public and accessible tools and guidance on what the intended outcomes are, their definitions, the methodology to monitor progress and substantiate claims, and the scope and level of claim
- Accurate: Built upon existing, tested indicators and science-based methodologies with references provided for standard operating procedures, methods, and/or specific guidance on the assessment methodology
- Relevant: Users can make a context-appropriate selection of indicators within each outcome area



Photo: Carl van der Linde

Making, managing, and reporting on credible claims

Despite the challenges, credible and transparent claims are a key tool to build support for regenerative agriculture with consumers and other stakeholders. Credible claims will build trust in the concept of regenerative agriculture, ensuring it's not diluted or co-opted. Claims add value to the brand and industry if done authentically and intentionally.

The following outlines the steps to make, manage, and report on credible claims.

Step 1. Decide to make a claim

Making regenerative agriculture claims should start with a clear ambition and goal. Claims and communications of any type should be made consciously and genuinely and only when information is in place to substantiate claims. This does not mean greenhushing, but there should be a strategy and plan for credible claims and sufficient resources allocated for the necessary systems for making and managing those claims.

Step 2. Define the main audience and format

Claims can be directed at different audiences and through different formats and channels, both internal and external. Defining the target audience is important to ensure it can be easily understood by that audience as well as to inform important legal considerations. For example, claims to the public require more accessible language and information to support them than internal claims or business-to-business claims. Claims targeted at consumers may have specific legal requirements in countries of production and in the countries where products are placed on the market.

When defining the audience and format, there are some key considerations:

- Any legal requirements, especially for consumerfacing claims and on-product claims
- Any legal requirements for mandatory reporting
- Access to additional and supporting information
- Ability to correct/change/update claims
- If the claim will be passed along in the supply chain and maintaining integrity

Step 3. Define if it's an individual company or collective claim

Companies can make claims about their commitments, actions, or performance results as an individual company or as part of collective action or sectorwide effort. The collective itself may also make claims (e.g., Banana Retail Commitment on Living Wage).

Essentially, collective action is the idea of achieving change and impact through coordinated action across multiple stakeholders. Collective action claims are about the collective commitments, actions, or performance by a group of organizations or a coalition, undertaking actions collectively. With any collective claims made, it's essential that specific roles, contributions, and responsibilities of each individual company should be clearly described within the broader collective effort.

While collective claims can be beneficial in demonstrating shared impact, many companies prefer to make individual claims due to brand positioning, regulatory clarity, or differentiation within the market. As industry guidance continues to evolve, it's important for brands to weigh the benefits of both approaches and ensure alignment with their overall claims strategy.

Principles for collective claims

Generally, the same principles apply to collective action claims as to claims by an individual company. Claims should be clear, accurate, relevant, and backed up by systems that are transparent and robust.

The implications for collective action claims:

- Include clear information on other partners and roles to avoid misleading or overclaiming
- Don't take credit for commitments, activities, or results of others
- Evidence/figures on progress are based on individual company efforts (and verified separately)

Example collective action commitment claim (include a public link to more details and project reporting against targets):

"We are currently engaged with global partner organizations X, Y, and Z, along with local partners, in five projects in India, with the combined aim to support more than 134,000 cotton farmers to adopt regenerative practices through training, setting up producer groups, and establishing community centers with initial investments of €5 million."

In some contexts—such as discrete projects with clearly defined contributors who share an action plan and outcomes—participants may decide to make claims based on proportional contributions, such as investments. These are relatively new and untested. Companies interested in these types of claims may refer to ISEAL's Landscape position paper 03 on effective company claims about contributions to landscape performance outcomes for further guidance.

Step 4. Define the type and scope of the claim: commitment, action, or performance

Based on the type of claim to be made, find out if the information and systems needed for clear, accurate, and relevant claims are in place, or if they will need to be developed. Clarify the scope and context of the claim.

For commitment claims, consider:

- Is there a time frame for the commitment? Is it realistic? What if it's not met in that time frame?
- Is there a system in place to report progress against the commitment?
- Are there clearly defined actions that will be implemented to meet the commitment?
- Are these actions adequately resourced and achievable in the time frame set?
- What is the claim about and scope?

Case example of commitment claim:

General Mills Global Responsibility Report 2025¹⁴

"Advance regenerative agriculture on one million acres of farmland by 2030.*"

Includes *qualifying language:

"One million acres represents around 30% of General Mills total estimated land print exposure (or the amount of land needed to grow volumes of the crops we buy or feed to animals for our ingredients) for producing key ingredients like grains and dairy."

The report includes how General Mills defines regenerative agriculture with specific intended outcomes of biodiversity, water, soil health, livestock well-being, farmer livelihood, and community resilience.

Elements of this commitment claim

- Clear scope: How regenerative agriculture and the intended outcomes are defined and are easily accessible in the web-based report
- Clear timebound target (one million acres by 2030)
- The claim is contextualized for materiality (30%)
- The report highlights investments and plans to reach the commitment
- Partners and co-funders are described with roles in the web report
- Term used: "Advance" regenerative agriculture is vague and not clear what is meant (or what counts)

For action claims, consider:

- Are the actions linked to the commitment and is it clear how they are linked?
- · What are the intended outcomes of the actions?
- Are the actions detailed enough to understand the context and scope?
- Are partners involved and contributing to any outcomes described?
- Is there a monitoring mechanism in place to track and report against the actions?
- · Will there be a public report on actions?
- Is verification needed (i.e., proof that the action has actually occurred)? Who will provide this verification and how?

Case example of action claim:

General Mills Global Responsibility Report 2025

Fiscal 2023 progress: 500,000+ acres of farmland enrolled in programs designed to advance regenerative agriculture. (Target one million acres of farmland by 2030.)

The actions to achieve that progress include training, pilots, financial resources for farmers, partnerships, policy advocacy, and producer promotion. These are detailed over several pages in the report.

The science-based measurement framework is described, as well as research partners named with links. The report describes the collaborative/contributing partners such as Walmart and National Fish and Wildlife, and their roles.

Elements of this action claim

- Actions are linked to the commitment
- Progress against targets is publicly reported with clear dates
- Programs and activities are detailed and described, along with monitoring mechanisms
- Links to studies and partnerships are provided
- Learnings are shared
- The report does not include information about any verification methods or its independence

For performance claims, consider:

- Is the scope clear and delineated on any outcomes claimed?
- What are the performance metrics being used and are they based on accepted science or understanding? Or are they contested or unproven?
- Are the performance claims clearly linked to any action or commitment claims?
- What is the research methodology and is it matched to the claim?
- What are the systems in place for monitoring and data collection? What is the verification method and quality assurance of the accuracy of the data and analysis?
 Does it need to be independent for credibility? Is the verification done by a credible organization?
- Is there baseline data available?

Case example of performance claim:

General Mills Global Responsibility Report 2025

The report provides high-level preliminary insights on ecosystem outcomes from programs and partners:

"A study with the Soil Health Institute found that soil health management systems increased net farm income for small grain production by US\$31/ acre across five farms in Canada and by US\$19/acre across ten farms in North Dakota and Kansas, primarily by reducing costs while supporting similar or higher yields."

The science-based measurement framework is described, as well as research partners. Links to external studies are provided for soil health pilots as well as case study links and states regarding on-farm research:

"Collaborating with partners to publish this work in peer-reviewed scientific journals."

Reflections in the report highlight transparency on some of the challenges:

"On-farm data is messy and complex, it's affected by weather and other forces outside of farmer control and it takes time. Early results from on-farm research we've supported on regenerative agriculture are a mix of positive, inconclusive, and neutral."

Elements of this commitment claim

- Links to research studies are provided
- Geographical and product scope is clearly delineated
- Methodologies are included and described
- Outcomes are framed as "preliminary insights" rather than conclusive evidence
- Qualifying language such as "contribution" and "indicate" rather than absolutes used
- Truthful about limitations including inclusiveness of early results
- Generalizations on any claims on outcomes are limited by the small sample sizes and case studies methodology

Managing claims

Claims management includes the creation, review, approval, and oversight of claims. It's important because it supports compliance efforts by helping ensure that claims are credible, well-documented, and aligned with relevant regulations. While it plays a critical role, it's one component of a broader system—alongside scheme design and supporting infrastructure—that collectively contributes to compliance. Claims management also helps to maintain brand reputation, build trust with stakeholders, and promote consistency across marketing materials and channels, improving efficiency and reducing potential risks.

While beyond the scope of this guide, it's recommended that companies establish their own internal guidelines and policies around claims management. This can be used to ensure that they are in line with the basic principles of being clear, accurate, and relevant with transparent and robust systems. This should complement compliance processes and policies. If sourcing from a scheme or standard system, any claims should follow their claims management and policy.

Transparent and robust systems

Particularly for action claims and performance claims, a robust monitoring and evaluation system should be in place to generate reliable and accurate data and evidence to back up the claims. This includes ongoing monitoring and verification of information and substantiating evidence that is relevant and up to date to support the claim. The method of verification should be fit for purpose, based on the level of proof needed for credibility. Claims based on certification schemes should be underpinned by transparency and credibility, with clear checks on the scheme's ownership, governance, objectives, standards, and verification mechanisms. This information, including context, evidence, and method of verification, should be freely and easily accessible.

Within organizations, cross-functional collaboration across departments—such as marketing, research and development, and legal compliance—is essential to establish robust systems that govern when and by whom claims can be made, based on clearly defined criteria. This may include standardized workflows for review, approval, and monitoring to help avoid regulatory risk.

Proactively monitoring claims helps to safeguard against litigation and reputation damage. This should be defined in the claims management system with clear assigned responsibilities for claims control, approval, and monitoring. Monitoring may be supported by external actors such as auditors or independent contractors.

A brand can monitor claims by actively tracking mentions of their brand across various online channels and analyzing the sentiment surrounding those mentions. This will help to understand how people perceive their brand claims and identify any potential issues or inaccuracies being circulated about their products. An easily accessible reporting tool that allows stakeholders to report perceived misuse of claims can be used as an early warning system. A clear point of contact should be established for handling complaints related to claims, supported by a standardized workflow to ensure complaints are valid (i.e., supported with evidence) and that they are promptly addressed.

While first-party verification mechanisms are valuable for internal monitoring, they carry inherent risks of bias, as companies may unintentionally emphasize positive results while underreporting challenges. To enhance credibility, companies should complement first-party verification with periodic independent audits or third-party assessments (e.g., annually). This dual approach safeguards against potential misrepresentation and reinforces stakeholder trust in the reported data.

Reporting on claims

In today's landscape, organizations are expected to transparently communicate their sustainability strategies, operations, and achievements. This is driven by various factors, including corporate commitments, heightened scrutiny of business practices, evolving consumer and shareholder expectations, and tightening legislation around reporting and disclosure setting requirements on transparency and standardization (see appendix: Evolving claims and reporting legislative landscape).



Reporting should be **transparent**, **accurate**, and **timely**.

For accountability, companies should report about their actions and targets, and the extent to which they have fulfilled their commitments. Reporting shouldn't solely focus on accomplishments. Instead, transparently showing progress, even if there is still a long way to go or if some areas need improvement, will increase credibility and acceptance by the public.

See the Accountability Framework Initiative

Operational Guidance on Reporting, Disclosure,
and Claims for further resources.

Reporting in a comprehensive, transparent way sets a baseline to build an authentic narrative for creating value for stakeholders with progress, attracting further buy-in.

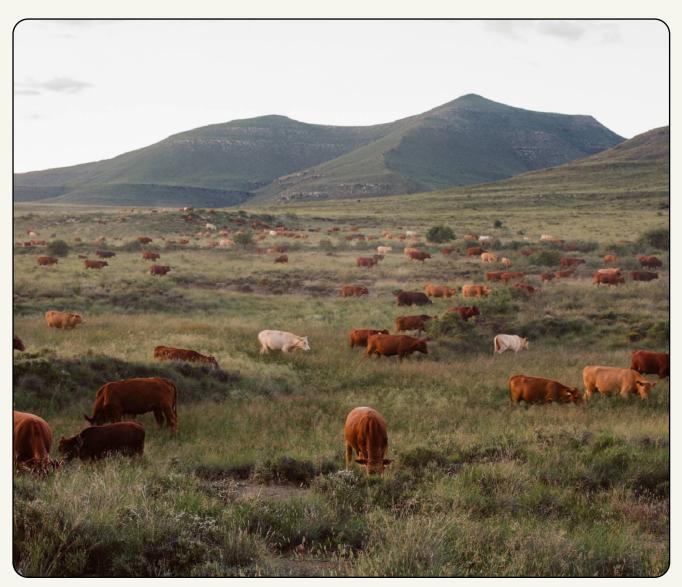


Photo: Carl van der Linde

Role of companies in supporting regenerative outcomes

Overview

Credible claims are essential for advancing industry progress and driving meaningful change. To make effective claims, it's important to first understand the role companies play in advancing regenerative outcomes. Recognizing the different entry points and strategies companies adopt helps clarify how claims can be used and leveraged along the pathway to those outcomes.

To support this effort, Textile Exchange's <u>Regenerative</u> <u>Agriculture Outcome Framework</u> recognizes farm-level regenerative practices as part of a broader three-stage process originally developed by VF Corporation.¹⁵

Regenerative Agriculture Outcome Framework

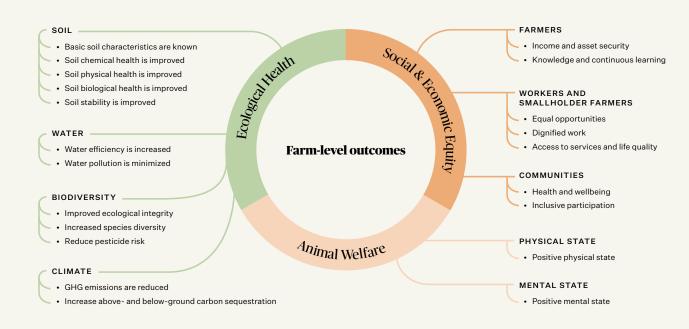


Figure 6: Textile Exchange Regenerative Agriculture Outcome Framework, 2025.

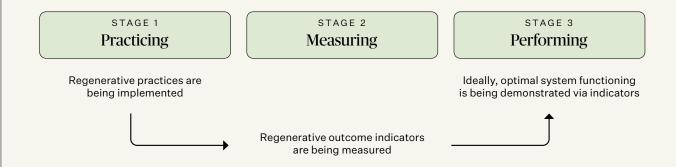


Figure 7: From farm-level implementation to regenerative outcomes.*

^{*} Please note that the graphic is included for illustrative purposes only and is not representative of the entire Regenerative Agriculture Outcome Framework. The entire framework and supporting documents are available on the Textile Exchange website.

Overview

Brands and other downstream actors support, incentivize, and can play a key role in the implementation of regenerative practices at the farm level—Stage 1 Practicing—through a range of roles and activities.

A basic, simplified theory of change (Figure 8) highlights how brands affect change from inputs (commitments and actions) to short-term outputs (implementation of regenerative practices) to medium- and longer-term regenerative agriculture outcomes (Stage 3 performing). Ongoing monitoring and Stage 2 Measuring are important for evidence to back up claims, as well as understanding change and adaptive management.

It's important to note that progress may not always be linear toward the outcomes. But being able to communicate about the different stages of the process creates opportunities for companies to support their supply chain partners in the transition toward regenerative agriculture as well as recognize and reward those that are delivering regenerative outcomes.

The theory of change explored in Figure 8 also highlights the main roles of companies in driving and incentivizing the implementation of regenerative agriculture practices, leading to regenerative agriculture performance outcomes. Note that this is an oversimplified pathway to outcomes, recognizing that there are many enabling and hindering factors. It's intended to highlight the different roles companies can play in supporting farmers to implement practices leading to positive outcomes.

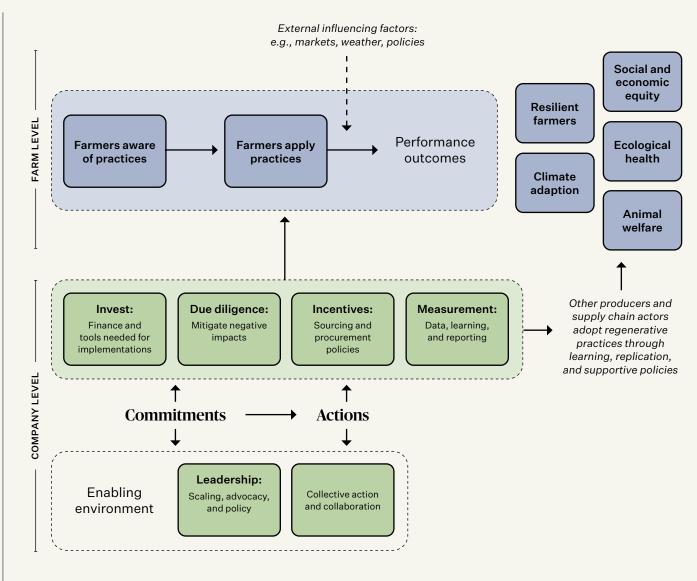


Figure 8: Basic theory of change from commitments and action to performance outcomes

Commitments as a stepping stone to impact

With increased interest in regenerative practices, there has also been a rapid increase in company commitments across sectors and geographies. Particularly, agrifood companies are making public regenerative agriculture commitments. In 2024, most major food companies have a page on their website dedicated to regenerative agriculture (sometimes used interchangeably with "sustainable agriculture" in that industry). A large portion of these have clear goals with target dates.¹⁶

Corporate sustainability commitments send a clear signal to stakeholders—from consumers and employees to investors, policymakers, and civil society actors. Public commitments demonstrate leadership, create accountability, and incentivize supply chain actors. There are many sustainability ranking and rating programs of companies based on their public commitments.

Commitments can range from investments:

"...launch a regenerative fund with an initial investment of €5 million over five years. The fund aims to transition one million hectares to regenerative agricultural practices by 2025, focusing on the group's key commodities such as wool, leather, cashmere, and cotton."

—Global fashion group

To sourcing policies:

"...committed to transitioning 100% of our wool sourcing to regenerative farming methods by 2030."

—Family-run clothing brand

"By 2030, the leading raw materials (e.g., forest products and cotton) that go into our owned brand products to be 100% recycled, regenerative (link to definition) or sustainably sourced."

—U.S. retail corporation

To support of a particular tool, program, or standard:

"Advance regenerative agriculture practices across 10 million acres of North American agricultural land by 2030 through the RegenX program."

—Global food ingredient company

The textile industry has a significant opportunity to use commitments related to regenerative agriculture to send clear leadership signals and inspire a race to the top. Brands can raise consumer awareness of regenerative agriculture through public commitments and influence purchasing decisions that support the scaling of regenerative systems.



Photo: Carl van der Linde

Actions to drive the implementation of regenerative practices

Corporate commitments are a positive step, but they need to turn into action to promote, incentivize, and support the implementation of regenerative practices by farmers. These are the outputs, or direct results of company actions and investment in regenerative agriculture. There is a wide range of actions to support the implementation of regenerative practices at farm level. Actions will depend on the company and context. Actions can be directly implemented within the company or supply chain, or indirectly to support the enabling environment. See Table 1 for examples.

Direct actions	Textile industry case examples	Indirect actions	Textile industry case examples
Investments in cost-sharing/ risk-sharing mechanisms such	Native provided the upfront capital needed to help farmers and ranchers adjust their land	Collaborating with peers to support efforts and solutions.	Textile Exchange Regenerative Agriculture Community of Practice.
as training, additional inputs, or other key regenerative conversion elements upfront.	management practices to a regenerative approach that benefits the local ecosystem, the productivity of their land for grazing sheep, and the climate.	Sponsoring industry research into regenerative practices (general rather than specific supply chain).	Soil Health Institute and Ralph Lauren: U.S. Regenerative Cotton Fund.
Loans and/or grants to support producer investments in regenerative agriculture practices.	Organic Cotton Accelerator Farm Programme helps de-risk change on the ground through payments to farmers at the beginning of the season. Regenerative Fund for Nature aims to transform one million hectares (2.5 million acres) of farms and rangeland in fashion's supply chains into regenerative agriculture spaces by 2026.	Supporting programs to leverage the power of policy to affect large-scale change.	Madewell, Smartwool, The North Face, Timberland, and Vans brands joined Regenerate America, a U.Sbased coalition of farmers, businesses, nonprofits, and individuals to lobby for increased support for regenerative agriculture practices in the 2023 Farm Bill.
Responsible procurement practices: e.g., pricing long-term contracts to share risks and rewards with farmers.	\$800,000 USD paid in premiums to J.Crew Group's regenerative farming partners in India and the U.S.	Collective action platforms for joint coordinated action.	Regenerative Fund for Nature (Conservation International, Kering, Inditex).
Implementation of regenerative agriculture practices such as	ture practices such as <u>Nature</u> in the Büyük Menderes River		Regenerative Production Landscape Collaboratives (Laudes Foundation, IDH, WWF India).
Basin, Türkiye (WWF-Türkiye). and diversification in pilots, projects, and/or supply chains.	Investing in the development of regenerative agriculture frameworks, tools, and/	Textile Exchange Regenerative Agriculture Outcome Framework	
Sourcing from third-party programs that promote regenerative agriculture.	In fiscal year 2023, nearly half (48%) of the wool from the icebreaker brand was sourced from growers implementing regenerative practices via the ZQRX (Regenerative Index) platform.	or standards. These may be based on best practices or creating common measurement frameworks for outcomes.	Patagonia partnered with farmers, Rodale Institute, and other business leaders to create the Regenerative Organic Alliance which created the Regenerative Organic Certification.

Table 1: Actions to drive the implementation of regenerative practices

From outcomes to impacts

Outcomes are the results that come from the implementation of regenerative agriculture practices, supported by the enabling environment. These include changes in social, environmental, and farm productivity outcomes, and in policies/business practices. Impacts are the higher-level effects, or results, from the outcomes.

Progress may not always be linear toward the intended outcomes and there is increasing complexity as a company moves from commitment to action to performance outcomes. Many factors enable or hinder whether these are achieved. These include external factors such as markets, weather, and government policies. Therefore, it gets increasingly difficult to understand what company activities have contributed to longer-term change. Measuring outcomes (performance) is challenging; see the above Methodological considerations section.

The context-based nature of regenerative agriculture and its many definitions lead to different pathways being taken to reach the intended outcomes and impacts. A standardized outcome framework creates a common language of not just what the outcome means, but importantly for claims, provides transparency on the methodology and indicators needed to support robust monitoring and verification. This enables consistency and creates a "level playing field" for sector data interoperability and comparability, enhancing transparency, and building trust.

Common metric frameworks, such as Textile Exchange's <u>Regenerative Agriculture Outcome</u>
<u>Framework</u> (see Figure 6), facilitate collaboration for partnerships and collective action to share the costs and risks of getting quality outcome data.

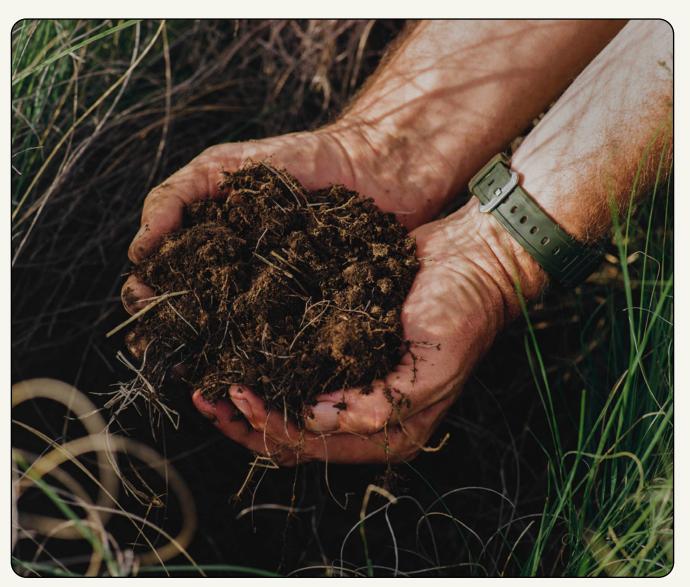


Photo: Carl van der Linde

Conclusion

Closing thoughts

Regenerative agriculture can deliver critical benefits for climate, nature, people, and animals. Despite this potential and the growing interest in the textile industry, its widespread adoption remains limited because of a range of challenges.

Companies can play an important role in addressing these challenges and scaling up regenerative agriculture by making commitments, investing in implementation, and working collaboratively across the supply chain. Communicating their commitments, actions, and emerging outcomes is essential to build trust among consumers and other stakeholders. When the claims are made and communicated in a credible way it can be a key enabler in unlocking regenerative agriculture's full potential and driving positive systemic change.

This guide provides foundational principles and recommendations, but it's essential to stay informed about evolving legislation and emerging tools. The landscape for regenerative agriculture is shifting rapidly as global urgency around climate and social issues intensifies.



Photo: Carl van der Linde

Acknowledgements

This guidance document for regenerative agriculture claims was prepared by Aimee Russillo (LiSeed Consulting) under the guidance of the Textile Exchange Project Team. It was developed by building on existing documents including the ISEAL Code and claims guidance, ISO standards, existing regenerative agriculture frameworks, and key emerging regulations around sustainability claims and labeling. This document builds directly on the ISEAL Challenge the Label 5 Universal Truths and ISEAL's Living Wage Claims Guiding Framework.

Textile Exchange Project Team:

- Hanna Denes
- Jennifer Inaba
- Beth Jensen
- Taylor Jones
- Zach Kniestedt
- · Stefanie Pokorski

The Project Team acknowledges the support and guidance from Textile Exchange's Regenerative Agriculture Community of Practice.



Photo: Carl van der Linde

Appendices

Reference documents

Regenerative agriculture frameworks

Textile Exchange Regenerative Agriculture documents

- Textile Exchange Regenerative Agriculture Landscape Analysis (2022)
- <u>Textile Exchange Regenerative Agriculture</u>
 Outcome Framework (2025)

Other regenerative agriculture outcome frameworks

- SAI Platform Regenerating Together Programme industry driven, food and beverage sector
- Regen10 Outcomes based Framework multistakeholder food and beverage sector

Accountability Framework Initiative

Operational Guidance on Reporting, Disclosure, and Claims 2020: Guidance on good practice for company reporting against commitments related to the Accountability Framework's scope, including regular public reporting, information disclosure, and claims about performance related to commitments.

EU reports, proposals, and regulation around sustainability claims, labeling, and reporting

- European Commission. Environmental claims in the EU Inventory and reliability assessment. Final report (2020)
- EU Empowering Consumers Directive 2024/825 (2024)
- EU Green Claims Directive proposed
- The European Union's Corporate Sustainability Reporting Directive
- Corporate Sustainability Due Diligence Directive 2024/1760

ISEAL code and claims guidance

- ISEAL Credibility Principles. (V2.0, 2021)
- ISEAL Code of Good Practice for Sustainability Systems. (V1.0, 2023)
- ISEAL Effective company claims about contributions to landscape performance outcomes. (2023)
- ISEAL Impact and outcomes claims and communications Guidance. (2016)
- ISEAL Making Credible Jurisdictional Claims
 Good Practice Guide. (V1.1, 2022)
- ISEAL Making credible living wages claims. A framework to guide practices. (V1.0, 2023)
- ISEAL Sustainability Claims Good Practice Guide. (V1.0, 2015)

ISO standards

- ISO/TS 17033:2019 Ethical claims and supporting information—Principles and requirements
- ISO 14021:2016 Environmental labels and declarations—Self-declared environmental claims (Type II environmental labelling)
- ISO 14021:2016/Amd 1:2021 Environmental labels and declarations—Self-declared environmental claims (Type II environmental labelling)
 Amendment 1: Carbon footprint, carbon neutral

Additional resources

- Changing Markets Foundation 2021
- <u>Deloitte Insights. Building Credible</u>
 <u>Climate Commitments.</u> A roadmap to earning stakeholder trust. (2021)
- The Great Greenwashing Machine Part 1: Back to the Roots of Sustainability, Veronica Bates Kassatly and Dorothée Baumann-Pauly
- ICC Advertising and Marketing Communications
 Code. (11th Edition, 2024)
- LeBaron, G., Lister, J., & Dauvergne, P. <u>Governing</u>
 Global Supply Chain Sustainability through the Ethical
 Audit Regime. Globalizations, 14(6), 958–975. (2017)
- The Netherlands Authority for Consumers & Markets. <u>Guidelines regarding</u>
 Sustainability Claims. (V2.0, 2023)
- South Pole's Net Zero Report 2023/2024
- UN Playbook: UNEP and UNFCCC. The Sustainable Fashion Communication Playbook. (2023)
- United Nations Environment Programme.
 Guidelines for Providing Product Sustainability
 Information: Global Guidance on Making Effective
 Environmental, Social and Economic Claims, to
 Empower and Enable Consumer Choice. (2017)
- UK Government. Competition and Markets Authority.
 Guidance. Complying with consumer law when making environmental claims in the fashion retail sector. (2024)

Glossary

Adapted to the context from OECD "Glossary of Key Terms In Evaluation And Results Based Management." 2022

Inputs:

The financial, human, and material resources

Actions:

The activities, investments, etc. which take inputs, such as funds, technical assistance, and other types of resources, that are mobilized to produce specific outputs

Outputs:

The direct results from the company's actions

Outcomes:

The short-term and medium-term results or changes resulting from the outputs

Impacts:

The long-term, higher-level broad, and lasting changes resulting directly and indirectly from the company's actions, as well as other actors and influencing factors

Adapted from various ISEAL guides and credibility principles (see appendix: Reference documents).

Regenerative agriculture claim:

Defined as words and/or images used to differentiate and promote a product, process, business, or service with reference to some aspect of regenerative agriculture-controlled claims, assured claims, and marketing claims.

Claims:

Promotional communications about the sustainability attributes of a product, process, service, or organization. This includes communications about the assurance status of a client and/or the client's association with the scheme. Note: These communications can be business-to-business or business-to-consumer and can be made by the scheme owner or by its clients. Claims can be made via a range of media including text, logos, labels, trust marks, etc. (ISEAL Living Wage Claims Dec 2023)

Assured claims:

A claim that results from an assurance process against the standard. Refers to claims about a product, process, business, or service that has been certified or verified in compliance with a [regenerative agriculture] standard. Examples include logos, labels, and claims of certification against a standard. (adopted ISEAL Sustainability Claims Good Practice Guide 2015)

Controlled claims:

A claim directly linked with a standards system and which requires approval by that standard system for use. Controlled claims include assured and marketing claims. Controlled claims require approval and traceability along the supply chain. (adopted ISEAL Sustainability Claims Good Practice Guide 2015)

Marketing claim:

A claim that is used for marketing to promote regenerative agriculture commitments, actions, and/or performance.

Collective action claim:

A claim that is made about the collective commitments, actions, or performance by a group of organizations or a coalition, undertaking actions collectively. (ISEAL Making Credible Living Wage Claims V1.0 Dec 2023)

Typology of claims

Commitment claims:

Claims about commitments to specific goals, targets, and/or actions to advance or achieve regenerative agriculture outcomes.

Action claims:

Claims about specific actions, including investments taken, to advance or achieve regenerative agriculture outcomes and/or meet commitment targets.

Performance claims:

Claims about progress toward, or achievement of, specific regenerative outcomes and/or impacts.

Evolving claims and reporting legislative landscape

In an era where environmental and social awareness is high and there's growing access to information in terms of both volume and speed, consumers and investors are increasingly scrutinizing the sustainability claims made by businesses. Governments worldwide are stepping up to protect consumers and ensure transparent practices in the marketplace. The EU has been at the forefront of regulations to ensure transparency and accuracy in claims being made. Several key EU regulations need to be considered for regenerative agriculture claims, with a focus on credibility, transparency, and third-party verification, and play a critical role in ensuring claims align with European standards.

A brief overview of these regulations is provided below. This is not an exhaustive list. It remains the responsibility of individual users to ensure compliance with relevant legislation.

Government legislation and guidance on greenwashing, reporting, and disclosure

The EU's Green Deal is a package of policy initiatives that includes the Empowering Consumers for the Green Transition Directive (ECD) and the European Union Green Claims Directive (GCD). Together, these two directives will create a single regulatory framework intended to help consumers make more sustainable decisions and reduce the risk of greenwashing.

Empowering consumers for the Green Transition Directive

Adopted in March 2024, this directive aims to help consumers make informed green choices by providing reliable information about products and services. It also aims to protect consumers from unfair green claims and improve their knowledge of product repairability. EU countries are required to transpose

the directive into their national law by March 27, 2026. The rules will apply from September 27, 2026.

European Union Green Claims Directive

Proposed in March 2023, this directive aims to address greenwashing by establishing clear standards for companies to substantiate their environmental claims. While not finalized, it would regulate certain environmental claims, meaning any statement (written and oral) or imagery which gives the impression that: (1) a product or organization has a positive or zero impact on the environment, (2) is less damaging to the environment than other similar products/ organization, or (3) has improved its impact over time.

In particular, the GCD would regulate voluntary environmental business-to-consumer claims and relate to a product, service, or the trader itself.

The GCD requires companies to use scientific evidence and transparency, and to verify their claims through certification schemes. Key aspects of the GCD:

- **Substantiation:** Companies must carry out an assessment to substantiate their claims before making them public.
- Verification: Explicit environmental claims must be verified through certification schemes.
- Minimum criteria: The GCD introduces minimum criteria for environmental labels and labeling schemes.
- Fines: The maximum fine for infringements is 4% of a company's annual turnover, and fines increase for repeated violations.
- Confiscation: Authorities can confiscate revenues gained from transactions involving noncompliant environmental claims.

 Exclusion from public procurement. Traders in violation may be excluded from public procurement processes for up to 12 months.

The GCD is expected to influence consumer trust, business practices, and the regulatory landscape.

The European Union's Corporate Sustainability
Reporting Directive (CSRD) and Corporate Sustainability
Due Diligence Directive (CSDDD or CS3D) are
complementary laws that work together to establish
a regulatory framework for sustainability and due
diligence in the EU as part of the EU Green Deal.

European Union Corporate Sustainability Reporting Directive

This directive focuses on reporting and standardizing non-financial reporting procedures. It requires companies to comply with EU sustainability reporting standards and to report on adverse impacts, positive impacts, financial risks, and opportunities within the entire value chain. It applies the double materiality concept: Reporting of sustainability risk (including climate change) affecting the company AND the company's impact on people and environment framework. It legally requires inscope companies to comply with the detailed European Sustainability Reporting Standards, giving stakeholders a thorough understanding of the company's activities and preventing greenwashing. It also requires that sustainability information disclosed under the CSRD must be subject to a limited assurance audit, ensuring that the data is reliable and accurate. Entered into force on January 5, 2023, applicable companies will have to apply rules in the 2024 financial year for reports published in 2025.

Evolving claims and reporting legislative landscape

Corporate Sustainability Due Diligence Directive

CSDDD focuses on due diligence, including identifying, evaluating, and mitigating the impact of a company's operations and supply chains on human rights and the environment. Claims around social and environmental impacts, such as improving farmers' income, must align with the CSDDD's principles of accountability and due diligence. Entered into force on July 25, 2024, it applies to large EU companies and non-EU companies with a significant turnover threshold in the EU. The application of the CSDDD will increase over time.

In addition to existing regulatory frameworks, the EU's February 2025 Omnibus package introduced amendments to the Corporate Sustainability Due Diligence Directive and the Corporate Sustainability Reporting Directive, further strengthening corporate obligations regarding sustainability claims. Companies making regenerative agriculture claims should consider the implications of these updates, particularly in relation to supply chain due diligence and substantiated reporting.

South Korea

In South Korea, current legislation against greenwashing under the Development and Support for Environmental Technology Act, has never resulted in penalties, so more stringent and enforceable penalties are in draft to hand out fines to a financial penalty of three million won (\$2,270). It will be handed out to companies that are deemed to have misled the public about their environmental impacts and green credentials. The government amended the Act on Fair Labeling and Advertising in 2023 and proposed updates to the 2019 Guidelines for Labeling and Advertising of Eco-friendly Business Activities on corporate compliance with labeling

and advertising for eco-friendly business activities. These include basic principles of truthfulness, clear, specific, relevant, complete, substantiated, and verifiable.

United Kingdom

The UK <u>Green Claims Code</u> provides guidance on making environmental claims that are clear, accurate, and not misleading. This code reinforces the importance of transparency and ethical communication in sustainability marketing. Published 2021.

Financial Conduct Authority <u>anti-greenwashing rule</u> is aimed at bolstering trust and transparency in sustainable investment products while combatting the prevalent issue of greenwashing. Published April 23, 2024.

The Competition and Markets Authority released guidance on complying with consumer law when making environmental claims in the fashion retail sector to help explain how fashion retail businesses can follow the Green Claims Code when making environmental claims. Published September 2021.

United States of America

The Securities and Exchange Commission (SEC) adopted climate risk and emissions disclosure rules on March 6, 2024 with the Enhancement and Standardization of Climate-Related Disclosures for Investors. The rules require public companies to provide more consistent and reliable information about climate-related risks and how they are being managed. The rules cover requirements on climate risks, financial impacts, management oversight, and greenhouse gas emissions. The first annual reports that must comply with the rules will be those for the year ending December 31, 2025. However, on April 4, 2024, the SEC issued a stay of the rules pending judicial review.

Federal Trade Commission Green Guides (not enforceable) were first issued in 1992 and were revised in 1996, 1998, and 2012. The guidance they provide includes: 1) general principles that apply to all environmental marketing claims including clear, accurate, and relevant; 2) how consumers are likely to interpret particular claims and how marketers can substantiate these claims; and 3) how marketers can qualify their claims to avoid deceiving consumers. While dated, even over a decade ago, the guides note that:

"Third-party certification does not eliminate a marketer's obligation to ensure that it has substantiation for all claims reasonably communicated by the certification."

Some examples from other countries

- Netherlands: The Netherlands Authority for Consumers & Markets Guidelines regarding Sustainability Claims version 2, 2023
- Australia: Climate related financial disclosure proposal
- Canada: ESG and climate-related financial disclosure proposals

UNEP Playbook Principles and Check List. Extracted from The Sustainable Fashion Communication Playbook (2023).

Foundation Level: Information. Ensure relevant information is clearly and transparently shared, providing an evidence-base that is verifiable and comparable while adhering to relevant regulatory policies.

Lead with Science: 'Lead with science' is the starting place for all communication, as well as the foundation for everything else to grow from. It is the information layer, showing scientific rigor and a dedication to evidence, transparency, and accessibility.

Principle 1: Commit to evidence-based and transparent communication efforts.

Principle 2: Ensure information is shared in a clear and accessible manner.

Principle 1: Commit to evidence-based and transparent communication efforts

- **Do** provide accurate, detailed and clear information on relevant sustainability attributes, ensuring the message conveyed reflects the evidence. Make sure claims are specific and explicit so they can be understood and interrogated.
- Don't only provide limited information that is hard to access or find. There should be no intention to hide or omit details.
- Do work with established third-party certification schemes and standards, as well as accepted industry data sources to both provide evidence and substantiate claims, and to verify them. Ensure you are working with reliable organisations to do so, endorsed or applied by governments, nongovernmental organisations or competitors. Where possible, join existing schemes instead of creating new singular methodologies to help facilitate greater harmony within the industry.
- Don't make assumptions or claims without evidence. Absence of evidence is not an excuse for greenwashing. If there is no robust basis for quantification, preferably certified by a third party, it is better not to claim it at all.
- **Do** detail the limits and assumptions of any claim and its evidence. Clearly share both what it achieves and what is omitted, providing context and outlining where further progress is needed. Ensure communication is clear about why the impact data is representative of the actual product, or indicate where it concerns only general, average data.
- Don't use a claim (or a headline) to mask or bring ambiguity to other issues, or to exaggerate the sustainability of the product, the range or a whole organisation, thereby misleading the consumer.
- Do focus first on credible communication about your own product and its attributes and/or impacts over comparative claims. However, if you are making comparisons, ensure they are fair. It can be useful for the consumer to establish performance against a benchmark, but context must be provided. This could be against where an item began (e.g., what the impact reduction is against a baseline), a similar product, the market average or a leading product. It is essential to carefully assess whether claims have the methodological, evidential and legal basis to allow consumers to directly compare (UNEP 2017b).
- Don't make unsubstantiated or subjective comparison statements, without quoting standards, test data or another basis to provide context.



Photo: Carl van der Linde

Principle 1 (continued)

- **Do** use language that is clear, easy to understand and factual. Keep up to date on industry definitions and the potential to misuse language. (See section 7 on 'Practical tools and resources' for helpful insights).
- Don't refer to vague terms that can easily be misinterpreted such as "eco", "green", "sustainable", "ethical", "regenerative", "crueltyfree", which on their own do not have standard definitions and require greater industry-wide scrutiny.
- **Do** provide traceability on all claims offer access to the methodology and sources of what you use. Be clear how, and by whom, it was developed, and where the evidence has come from. Where relevant, also engage with supplier communication teams to collectively determine information, narrative and content.
- 🚫 **Don't** use proprietary methodologies that are not shared.
- Do provide a truthful representation of your impacts. It is essential that information provided communicates at least the most significant and relevant impacts (hotspots). Referring to only a single issue or hotspot, or one with lower importance can mislead the consumer, as can using aggregate scoring which may hide a particularly negative impact. Ask the sustainability teams or those experts providing the information to present you with the full picture accordingly.
- Don't imply that a minor improvement has a major impact. For example, if 80% of a product's environmental impacts are during production, do not suggest that better packaging, which represents only 3% of overall impact, makes the product better than others. Similarly, do not promote a product when it only achieves the minimum regulatory requirements or common industry standard as though it is significantly better than what is expected.
- Do be transparent on processes and partners throughout your value chain. Employ advanced technologies (including blockchain, machine learning, the internet of things, or physical tracer technologies such as DNA marking) where relevant to help do so (UNECE 2022). Ensure the publishing of supplier lists is in a downloadable and machine readable format (csv, json or xlsx, aligning with the Open Data Standard for the Apparel Sector).
- Don't conceal details on your partners, processes or those of the suppliers you work with. At the same time, do not rely on transparency efforts as a brand differentiator or campaign in of itself.

Principle 1 (continued) **Checklist: Principle 1** Do follow the concept of human rights and environmental due diligence and report about Is there reliable, independent evidence progress. (See OECD Due Diligence Guidelines, as listed in section 7, for more) or high quality third-party certifications (\times) **Don't** hide issues and risks, or how the enterprise has addressed potential to substantiate and verify the claims? and actual harm, including with affected stakeholders. Are the methodology and sources made available to the public or at least to a competent body to assess the quantity Do take responsibility for what happens throughout your value chain. Own it through your communication. Even where and quality of information shared? you are not in control of them, you are accountable for impacts through every stage of production and consumption. Are limits of the claims clearly stated Don't shift the burden to the producers you rely upon. and given in context? Is it evident the claims are not masking negative impacts of the product or wider organisation? Do consider communication at a product level contingent upon also communicating what the overall brand is doing. ☐ Is the information shared a major driver Don't communicate the sustainability attributes of a product in isolation of brand of the sustainability performance of the activities (and vice versa) - this can be considered greenwashing. product, service or organisation? Does it provide a relevant view of the impacts, taking into account hotspots across environmental and social issues? Do state current position and progress in the context of long-term commitments. Communicate where the brand is on its journey (including relative to adopting a life cycle approach) and why it has not yet achieved something. ☐ Is the information shared done so relative Transparency does not need to be about perfection. Be honest about where gaps are and what is being worked on, to long-term commitments, making it clear but ensure there is a realistic plan in place for attaining long-term targets, including appropriate milestones. where the organisation is on its journey? Don't only point to long-term targets or give a false impression of progress because of them. Pledges and commitments are necessary, but it is also important to disclose the status and efforts underway to address them in real-time.

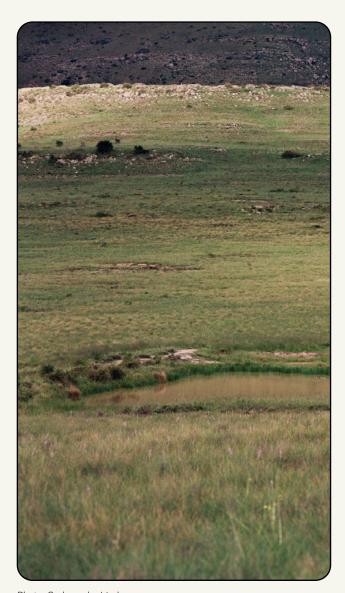


Photo: Carl van der Linde

Principle 2: Ensure information is shared in a clear and accessible manner

- Do ensure information shared (particularly of a technical nature) is clear, concise and easy to understand, whether via text or visuals. Ensure consumers can differentiate between product and brand information
- Don't use pictures, graphics, even colours that would serve to mislead the consumer or contribute to a different understanding of the validity of a claim.
- **Do** provide relevant and useful information to different consumer audience groups. Think about how to share digestible details for the majority, while providing further access for those interested to dive deeper. Educate customer-facing teams so they have the knowledge and skills they need to help customers make more sustainable/circular choices.
- Don't overload consumers with too much information up front in a way that only leads to confusion. For example, endless logos of certification schemes, especially those irrelevant to current claims or products. Conversely, do not oversimplify information so that it becomes another form of greenwashing.
- Do make all sustainable fashion communication accessible and simple to find. Share (relevant) information across multiple consumer touchpoints. This could be at point of sale, on multiple website pages (including on the corporate site and specific product pages) and via social media. Provide educational content in the moments consumers are most receptive to learning (e.g. when scrolling TikTok) versus when they are in shopping-mode.
- Don't bury information in clunky annual reports, audits and other non-consumer-facing communication channels, or restrict sustainability communication to the corporate page of a website only.
- **Do** consider the digital fluency of your target audiences when determining the best means of communication. Different age groups and markets/regions may be more fluent with digital means of communication and use of social media than others Also ensure inclusivity of content, incorporating e.g. subtitles, alt texts.
- Don't limit communication channels, leaving out key consumer groups, or create barriers to the information (such as small font size, technical language or data).

Checklist: Principle 2 Can consumers easily access sustainability information about the product, service or organisation? Can they do so using customary means of communication in their region? ☐ Is the information shared clear, useful and easy to understand? Is it well organised and structured, with additional details available elsewhere to support better and more technical understanding? ☐ Is the information communicated in an engaging and entertaining manner in order to drive effectiveness? Are sustainability claims/strategies/messages shared on an ongoing and timely basis?

Principle 2 (continued)

- **Do** support claims with narrative stories, case studies and testimonials to demonstrate and link back to further information. Creatively translate technical concepts into meaningful communication. Taking an approach that is engaging and entertaining can also increase the effectiveness of the communication.
- Don't limit to numbers and hard facts without adding detail and colour that helps make information digestible. Conversely do not oversimplify the information in a way that loses its credibility.
- Ob share information on an ongoing and timely basis, similarly ensuring evidence is kept up-to-date.
- 💢 **Don't** update information infrequently, relying only on annual reporting, or through specific campaigns and seasonal cycles.

Endnotes

- 1 Textile Exchange. (2022, January 01). Regenerative Agriculture Landscape Analysis. https://textileexchange.org/knowledgecenter/reports/regenerative-agriculture-landscape-analysis/
- 2 Textile Exchange. (2023, July 12). Regenerative Agriculture Outcome Framework. https://textileexchange.org/knowledgecenter/reports/regenerative-agriculture-outcome-framework/
- 3 For clarity, when this Guide refers to "regenerative agriculture," it is inclusive of both cropping and grazing systems. Textile Exchange's Regenerative Agriculture Outcome Framework and Regenerative Agriculture Landscape Analysis similarly encompass both aspects, recognizing the interconnected role of crops, livestock, and land management in achieving regenerative outcomes.
- 4 For information on claims relevant to specific regenerative agriculture programs, the standard owner's respective normative documents should be consulted. This includes adhering to any approval requirements for all claims, especially for on-product labeling and logos. Furthermore, any regulatory requirements or restrictions for the applicable jurisdiction need to be considered for any product claims or labeling.
- While this Guide provides principles applicable to various regenerative agriculture claims, product claims—particularly those at the SKU level—require a higher level of rigor, transparency, and data integrity. Regenerative fiber claims must be substantiated by clear evidence, including independent verification and traceability within brand product systems. Companies making claims about regenerative materials, certifications, or reduced impact due to Tier 4 regenerative practices must ensure robust documentation, verification, and consumer-facing clarity to avoid misleading representations.
- 6 Regenerative agriculture extends beyond ecological outcomes to include social and economic dimensions. Social and livelihood claims are integral for community well-being and knowledge transfer and should be communicated with care. When making such claims, companies should ensure proper consent from communities, provide tangible benefits where applicable, and incorporate social impact metrics into overall impact assessments to enhance transparency and accountability.
- 7 See appendix: Reference documents section, ISEAL Code and Claims Guidance.

- 8 See Textile Exchange's Regenerative Agriculture Landscape
 Analysis which looked at over a hundred different existing
 frameworks and the Regen10's Outcomes based Framework based
 on the analysis of 150 regenerative agriculture frameworks.
- 9 European Union. (2020). Environmental claims in the EU: Inventory and reliability assessment. [Final report]. https://circabc.europa.eu/ui/group/44278090-3fae-4515-bcc2-44fd57c1d0d1/library/b11ba10b-5049-4564-b47a-51a9bc9003c8/details?download=true
- 10 Changing Markets Foundation. (2022). Annual Report 2021. https://changingmarkets.org/wp-content/uploads/2024/01/ AnnualReport2021_compressed.pdf
- Bates Kassatly, V. and Baumann-Pauly, D. (2021, September 15). The Great Green Washing Machine - Part
 Back to the Roots of Sustainability. https://gcbhr.org/insights/2021/09/the-great-greenwashing-machine
- 12 European Parliament. (2024, November 10). 'Green claims' directive: Protecting consumers from greenwashing. [Briefing]. https://www.europarl.europa.eu/thinktank/en/document/EPRS_BRI(2023)753958
- 13 ISEAL. (2023, December). Making credible living wage claims. A framework to guide practice. [Version 1.0]. https://www.isealalliance.org/get-involved/resources/making-credible-living-wage-claims-guiding-framework
- 14 General Mills (2024). Global Responsibility Report. [pages 42-43]. https://www.generalmills.com/how-we-make-it/healthier-planet/environmental-impact/regenerative-agriculture
- 15 Three-step process developed by VF Corporation and gifted to Textile Exchange for use in conjunction with the Regenerative Agriculture Outcome Framework.
- 16 Marston, J. (2024, February 20). The 2024 list of agrifood corporates making regenerative agriculture commitments. AgFunderNews.

 https://agfundernews.com/the-2024-list-of-agrifood-corporates-making-regenerative-agriculture-commitments