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# THE PHENOMENON OF GREENWASHING IN EUROPEAN DIGITAL MARKETS AND CHANGES IN CONSUMER CONFIDENCE IN THE CONTEXT OF EUROPEAN UNION REGULATIONS

**Abstract**

This article investigates the phenomenon of greenwashing in European digital markets in the context of the EU's evolving regulatory framework, with particular emphasis on Directive 2024/825 on Empowering Consumers for the Green Transition (EmpCo). The paper identifies the principal mechanisms through which misleading environmental claims erode consumer trust, examines the regulatory response at EU level, and formulates strategic implications for firms operating in digital consumer markets. Drawing on recent regulatory documents, empirical studies, and the sustainable marketing literature, the article argues that credible green communication requires a fundamental shift from aspirational rhetoric toward verifiable, evidence-based claims supported by genuine organisational alignment. The EmpCo Directive, enforceable from September 2026, establishes a binding legal framework that reshapes the compliance obligations and communication strategies of businesses across all sectors. Findings contribute to the growing body of scholarship on sustainable marketing, consumer trust, and regulatory governance, and offer actionable guidance for marketers, compliance professionals, and policymakers.

**Keywords:** greenwashing, consumer trust, EmpCo Directive, green communication, digital markets, sustainable marketing.

## Introduction

The proliferation of environmental claims in consumer-facing communication has become one of the defining tensions of contemporary marketing practice. As sustainability has risen to the top of the corporate agenda, the volume of green messaging communicated across digital and physical channels has grown dramatically—as has the incidence of claims that are vague, misleading, or entirely unsubstantiated (European Commission, 2021; Crapa et al., 2024). This phenomenon, broadly termed greenwashing, represents a fundamental challenge to consumer trust, market integrity, and the credibility of genuine sustainability efforts (Lyon and Montgomery, 2015; Mladenovic et al., 2024).

The scale of the problem is significant. A 2021 study by the European Commission found that 53% of green claims examined across EU consumer markets were vague, misleading, or unfounded, while 40% lacked any substantiation whatsoever. Simultaneously, the EU market features over 230 sustainability labels with vastly different levels of transparency and verification rigour, creating a landscape in which consumers face acute difficulties in distinguishing authentic environmental commitments from superficial marketing gestures (EC, 2023). In digital environments, these challenges are amplified by the speed and reach of online communication, the opacity of algorithmic content promotion, and the growing influence of social media channels on consumer perception (Zhong and Zhao, 2024; Zupok, Dyrka and Kapała, 2025).

The regulatory response at EU level has intensified substantially. Directive 2024/825 on Empowering Consumers for the Green Transition (EmpCo)—adopted in March 2024 and enforceable from 27 September 2026—establishes binding rules that prohibit vague or generic environmental claims, extend the blacklist of unfair commercial practices to include greenwashing, and require that sustainability labels meet stringent certification or public-authority standards (EU, 2024). This regulatory shift, complemented by national enforcement activity in Germany, Italy, France, and other Member States, signals a fundamental reconfiguration of the legal and reputational risk environment for firms operating in European markets.

This article contributes to the intersection of sustainable marketing scholarship, consumer behaviour research, and regulatory analysis by providing an integrated examination of three interconnected dimensions: (1) the mechanisms through which greenwashing erodes consumer trust in digital markets; (2) the architecture and implications of the EU's regulatory response, centred on the EmpCo Directive; and (3) the strategic implications for firms seeking to communicate environmental values credibly and compliantly. In doing so, the paper extends the analytical framework developed in Zupok et al. (2025) on sustainable marketing communication, applying it to the specific regulatory and digital market context of the European Union in 2024–2026.

The remainder of the article is structured as follows: Section 2 presents the theoretical context and literature review; Section 3 analyses greenwashing mechanisms and consumer trust erosion; Section 4 examines the EU regulatory framework; Section 5 discusses strategic implications for firms; Section 6 presents conclusions and recommendations.

## Materials and methods

### *Theoretical Context and Literature Review*

### 1. Greenwashing: Definitions and Typology

Greenwashing—a portmanteau of 'green' and 'whitewashing'—refers to the practice of making misleading, exaggerated, or unsubstantiated claims about the environmental performance of a product, service, or organisation (Lyon and Montgomery, 2015). The concept encompasses a spectrum of communicative practices, ranging from the use of vague environmental terminology ('eco-friendly', 'natural', 'sustainable') without supporting evidence, to selective disclosure of positive environmental attributes while concealing negative ones, to deliberate misrepresentation of certification status or life-cycle impacts (Delmas and Burbano, 2011).

The academic literature distinguishes between 'symbolic' greenwashing—defined by Delmas and Burbano (2011) as the decoupling of environmental communication from genuine operational improvement—and 'substantive' greenwashing, which involves active misrepresentation of verifiable environmental data. Both forms damage consumer trust and competitive integrity, though they differ in their regulatory treatment and reputational consequences. More recently, scholars have identified 'digital greenwashing' as a distinct sub-category characterised by the exploitation of digital channel properties—including search engine optimisation, social media amplification, and influencer partnerships—to disseminate misleading environmental claims to large audiences at low cost (Crapa et al., 2024; Zhong and Zhao, 2024).

### *2. Consumer Trust and Green Communication*

Consumer trust in environmental claims is a multidimensional construct that encompasses cognitive, affective, and behavioural dimensions (Mladenovic et al., 2024). The cognitive dimension reflects the consumer's assessment of the accuracy and verifiability of a claim; the affective dimension relates to the emotional resonance of environmental narratives; and the behavioural dimension concerns the translation of trust into purchase intention, loyalty, and advocacy. Research consistently demonstrates that all three dimensions are sensitive to the perceived authenticity and consistency of a brand's environmental communication (Rabiu and Jaeger-Erben, 2024).

The concept of ‘green trust’, defined by Mladenovic et al. (2024) as the consumer’s confidence in the credibility of a brand’s environmental claims, has emerged as a key mediating variable between sustainable marketing communication and consumer outcomes. Green trust is strengthened by the presence of third-party certifications, transparent supply chain disclosures, and the alignment between a brand’s communicated values and its observable behaviour. Conversely, it is damaged by inconsistency, vagueness, and the absence of verifiable evidence—precisely the conditions that characterise greenwashing (Zupok et al., 2025).

Digital environments have introduced new dynamics to the formation of green trust. Social media platforms enable consumers to rapidly share, fact-check, and amplify information about brand environmental performance, creating a real-time accountability mechanism that constrains greenwashing but also exposes authentic sustainability efforts to scrutiny (Zhong and Zhao, 2024). Research by Crapa et al. (2024) demonstrates that the performance of green claims on social media is significantly moderated by the availability of third-party verification: verified claims generate higher engagement and positive sentiment, while unverified claims attract scepticism and reputational risk.

### *3 Sustainable Marketing Communication in the Digital Age*

The literature on sustainable marketing communication identifies several critical success factors for credible environmental messaging in digital environments. Fitri and Isa (2024) emphasise the role of narrative authenticity: green stories grounded in real operational outcomes generate stronger brand engagement than aspirational claims disconnected from measurable performance. Piwowar-Sulej et al. (2024) highlight internal alignment—the coherence between internal organisational culture and external communication—as a prerequisite for sustained credibility. Bai et al. (2024) explore the potential of artificial intelligence and machine learning to personalise environmental messaging at scale, while cautioning that technological sophistication cannot substitute for substantive environmental performance.

From the perspective of circular economy theory (Zupok, 2021; Kirchherr et al., 2017), credible sustainability communication is inseparable from the systemic integration of environmental values into business models, supply chains, and product design. The circular economy lens underscores the importance of communicating not only product-level environmental attributes but also the broader systemic contributions of business activity to resource efficiency, waste reduction, and ecological regeneration—dimensions that are increasingly relevant to the regulatory expectations embedded in the EmpCo Directive and the EU’s wider Green Deal architecture.

## Greenwashing Mechanisms and Consumer Trust Erosion in Digital Markets

### *1. Principal Mechanisms of Trust Erosion*

Five principal mechanisms through which greenwashing erodes consumer trust can be identified in the literature and regulatory evidence, summarised in Table 1 and elaborated below.

First, the use of vague environmental terminology represents the most pervasive form of greenwashing in digital consumer markets. Terms such as ‘eco-friendly’, ‘green’, ‘natural’, and ‘sustainable’ are applied across product categories without reference to specific environmental attributes, measurement methodologies, or comparison bases. The European Commission’s 2021 study found this to be the dominant form of misleading claim, accounting for the majority of the 53% of claims classified as vague or unfounded.

Second, the proliferation of sustainability labels without standardised verification has created a landscape of ‘label inflation’ in which consumers lack the cognitive tools to differentiate meaningful certifications from self-declared badges. With over 230 sustainability labels operating across EU markets, many with opaque governance and minimal verification requirements, the informational value of eco-labelling has been substantially degraded (EC, 2023). This proliferation is directly addressed by the EmpCo Directive's requirement that sustainability labels used in business-to-consumer communications from September 2026 must be established by a public authority or based on a compliant certification scheme.

Third, carbon offset claims have emerged as a particularly contentious category of greenwashing, in which firms claim 'climate neutrality' or 'net zero' status through the purchase of carbon credits rather than genuine emission reductions. National courts across Europe—including the German Bundesgerichtshof—have increasingly required that such claims specify the methodology employed and distinguish clearly between emission reductions and offsetting, establishing a jurisprudential precedent that the EmpCo Directive codifies into harmonised EU law.

Fourth, selective disclosure—the practice of communicating positive environmental attributes while omitting negative trade-offs—undermines the holistic assessment of product sustainability that informed consumer choice requires. Research by Mladenovic et al. (2024) demonstrates that consumers who detect selective disclosure exhibit significant declines in brand trust and purchase intention, effects that are amplified in digital environments where comparative information is readily available.

Fifth, digital greenwashing leverages the specific properties of online channels—algorithmic reach, influencer credibility, and visual storytelling—to disseminate misleading environmental claims at scale and low marginal cost. Crapa et al. (2024) document the use of 'green' visual aesthetics, environmental keywords, and influencer endorsements to create perceptions of sustainability that are disconnected from verifiable operational performance.

Table 1. Principal Mechanisms of Consumer Trust Erosion through Greenwashing

| Trust Erosion Mechanism | Illustrative Evidence |
|---|---|
| Vague environmental terminology ('eco-friendly', 'green', 'sustainable') | EC (2021): 53% of green claims examined were vague, misleading or unfounded |
| Generic sustainability labels without third-party certification | 230+ sustainability labels exist in EU with vastly different transparency levels (EC, 2023) |
| Carbon offset claims masking ongoing emissions | German Bundesgerichtshof ruling requiring specificity of 'climate-neutral' claims (BGH, 2024) |
| Selective disclosure: highlighting positives while concealing trade-offs | Mladenovic et al. (2024): credibility gaps reduce purchase intention significantly |
| Digital greenwashing via SEO and influencer amplification | Crapa et al. (2024): social media performance of green claims varies by sector and verification |

*Source: Authors' compilation based on EC (2021, 2023), Mladenovic et al. (2024), Crapa et al. (2024), BGH (2024).*

### *2 Digital Amplification of Greenwashing Effects*

Digital environments amplify both the reach of greenwashing and the speed of its detection and reputational consequences. On the one hand, social media platforms, search engines, and e-commerce ecosystems enable firms to disseminate green claims to millions of consumers at negligible cost, bypassing the editorial and legal scrutiny that characterises traditional advertising channels. On the other hand, the same digital infrastructure enables consumer advocacy organisations, journalists, and activist communities to rapidly identify, document, and amplify instances of misleading environmental communication, creating asymmetric reputational risk for firms engaged in greenwashing (Zhong and Zhao, 2024).

The interactive nature of digital communication also transforms the relationship between firms and consumers around sustainability claims. As documented in Zupok et al. (2025), consumers increasingly engage in real-time dialogue with brands about environmental performance, and the authenticity of responses to critical questions has become a significant determinant of green trust. Firms that respond to greenwashing accusations with transparent acknowledgement and corrective action consistently demonstrate more resilient brand equity outcomes than those that deny or deflect criticism.

## *The EU Regulatory Response: Architecture and Implications*

### *1 The Regulatory Landscape*

The EU's regulatory response to greenwashing has evolved through a layered architecture of directives, regulations, and national enforcement frameworks, as summarised in Table 2. The foundational instrument is the Unfair Commercial Practices Directive (UCPD) 2005/29/EC, which prohibits misleading commercial practices across all sectors. The 2024 amendments introduced by the EmpCo Directive extend the UCPD's scope to explicitly address environmental and social characteristics as core product features subject to consumer protection law (EU, 2024).

Table 2. EU Regulatory Framework for Environmental Claims (2020–2026)

| Instrument | Adopted | Key Provisions |
|---|---|---|
| EmpCo Directive 2024/825 | March 2024 | Bans vague green claims; blacklists misleading practices; enforcement from Sept 2026 |
| Green Claims Directive (proposal) | Withdrawn 2025 | Would have required pre-verified life-cycle substantiation for explicit claims |
| UCPD 2005/29/EC (amended) | 2005 / amended 2024 | Extended to cover environmental and social characteristics as core product features |
| EU Taxonomy Regulation | 2020 | Classification system for environmentally sustainable economic activities |
| ESPR / Digital Product Passport | 2024 (phased) | Requires digital lifecycle data for most product categories sold in the EU |

*Source: Authors' compilation based on EU (2024), EC (2023), EP (2024), Cooley (2026).*

## 2. The EmpCo Directive 2024/825: Core Provisions

Directive 2024/825, formally adopted on 28 February 2024, represents the most significant binding legal development in EU greenwashing regulation to date. It amends both the UCPD and the Consumer Rights Directive to establish a comprehensive framework for environmental and sustainability claims in business-to-consumer communications. Member States are required to transpose the Directive by 27 March 2026, with application—and thus enforcement—commencing on 27 September 2026.

The Directive's core provisions can be organised around three pillars. First, it expands the blacklist of prohibited commercial practices to include a range of greenwashing behaviours, including the use of generic environmental claims without reliable and verifiable evidence, the display of voluntary sustainability labels not based on approved certification schemes, and the making of claims about future environmental performance that are not supported by clear, objective commitments and implementation plans. Second, it treats environmental, social, and circular characteristics as key product features subject to the same consumer protection standards as functional attributes, closing a longstanding gap in EU consumer law. Third, it introduces specific requirements for the governance of sustainability labels, requiring that labels used from September 2026 either be established by a public authority or based on a certification scheme that complies with the Directive's transparency and verification requirements.

The EmpCo Directive does not introduce a mandatory pre-verification requirement for all environmental claims—this was the ambition of the proposed Green Claims Directive, which was withdrawn in 2025 as part of the EU's regulatory simplification agenda. However, the Directive's prohibition on claims not supported by verifiable evidence creates a de facto substantiation requirement that firms must satisfy if they wish to use environmental claims in consumer-facing communications. National enforcement authorities are empowered to impose penalties of at least 4% of annual turnover in the Member State concerned for infringements, establishing a meaningful financial deterrent.

### *3 National Enforcement Dynamics*

Even prior to the EmpCo Directive's entry into force, national enforcement activity across EU Member States has significantly shaped the standards to which environmental claims are held. Germany has been particularly active, with the Bundesgerichtshof establishing through case law that terms such as 'climate-neutral' must be accompanied by clear explanation of the underlying methodology, and that the use of offsetting rather than genuine emission reduction must be disclosed (BGH, 2024). Enforcement actions in Italy, France, Belgium, and Spain have similarly addressed misleading product labelling, green advertising claims, and ESG disclosures, creating a body of national jurisprudence that anticipates and in some respects exceeds the harmonised standards of the EmpCo Directive.

This divergent national enforcement landscape has created compliance complexity for firms operating across multiple EU markets, reinforcing the business case for proactive alignment with the EmpCo Directive's standards rather than a jurisdiction-by-jurisdiction compliance approach. The Directive's harmonisation function is therefore not only legally significant but also commercially relevant, reducing the transaction costs of multi-market compliance for firms that adopt its standards as a baseline.

## Strategic Implications for Firms in Digital Markets

### *1 From Aspirational Claims to Evidence-Based Communication*

The combined effect of evolving consumer expectations and the EmpCo Directive's legal requirements necessitates a fundamental strategic reorientation in how firms approach environmental communication. The dominant model of aspirational green marketing—characterised by emotionally resonant imagery, vague sustainability language, and campaign-based rather than integrated communication—is no longer viable in a regulatory environment that requires verifiable evidence for any explicit environmental claim. Firms must invest in the development of robust environmental data infrastructures that can supply the substantiation required for compliant communication (Aljebreen et al., 2024).

This transition requires not only changes in marketing communication practices but also structural changes in how sustainability data is generated, validated, and made accessible to marketing and communication teams. The cross-functional sustainability governance model advocated in the sustainable marketing literature—integrating marketing, operations, legal, compliance, and CSR functions around shared environmental performance data—becomes not merely a best practice recommendation but a compliance necessity under the EmpCo framework (Piwowar-Sulej et al., 2024; Zupok et al., 2025). Table 3 summarises the principal compliance areas and their strategic implications.

Table 3. EmpCo Directive Compliance Requirements and Strategic Implications for Firms

| Compliance Area | Required Action | Strategic Implication |
|---|---|---|
| Environmental claims | Substantiate with verifiable, objective evidence | Shift from aspirational to evidence-based communication |
| Sustainability labels | Use only public-authority or certified labels from Sept 2026 | Audit and rationalize current label portfolio |
| Digital marketing | Ensure online claims meet same standards as offline | Integrate legal review into content production workflows |
| Carbon neutrality claims | Specify methodology; distinguish reduction from offsetting | Avoid generic 'climate-neutral' claims without quantified basis |
| Internal alignment | Cross-functional sustainability governance teams | Marketing must draw on verified operational data |

*Source: Authors' compilation based on EU (2024), Cooley (2026), Senken (2026), Zupok et al. (2025).*

*2 Digital Channel-Specific Compliance*

The EmpCo Directive applies to environmental claims made across all channels, including digital platforms, social media, e-commerce listings, and influencer-generated content where firms exercise control or commissioning authority. This scope has significant implications for digital marketing practices. Firms must extend their claim substantiation and compliance review processes beyond traditional advertising to encompass social media posts, product listing descriptions, email marketing, and branded content partnerships with influencers or content creators.

The growing use of artificial intelligence in content generation and personalisation—identified by Bai et al. (2024) as an emerging frontier in sustainable marketing—introduces additional compliance considerations. AI-generated environmental claims that cannot be substantiated with verifiable evidence are equally prohibited under the EmpCo framework, regardless of whether the claim was authored by a human or generated algorithmically. Firms deploying AI content tools must therefore integrate compliance guardrails that prevent the generation or dissemination of claims that do not meet the Directive's substantiation requirements.

*3 Trust Rebuilding as a Competitive Advantage*

While the EmpCo Directive imposes compliance costs on firms that have relied on aspirational green marketing, it simultaneously creates a competitive opportunity for firms that can demonstrate genuine, verifiable environmental performance. In a market increasingly sceptical of green claims, the ability to substantiate environmental commitments with transparent, independently verified data constitutes a meaningful source of differentiation and consumer trust (Mladenovic et al., 2024; Rabiu and Jaeger-Erben, 2024).

Research consistently demonstrates that consumers do not expect perfection from brands on environmental performance, but they do demand honesty, transparency, and evidence of genuine effort (Zupok et al., 2025). Firms that communicate their sustainability journey authentically—including acknowledging current limitations and articulating credible improvement pathways—are better positioned to build durable green trust than those that project an unrealistically complete sustainability narrative. This insight, grounded in consumer psychology research, aligns with the strategic logic of the EmpCo Directive: by raising the evidentiary bar for green claims, the Directive creates conditions in which authentic sustainability communication is rewarded with competitive advantage.

The circular economy framework provides a useful strategic lens for repositioning environmental communication beyond product-level claims toward systemic value propositions (Zupok, 2021; Korhonen et al., 2018). Communicating the circularity of business models—including resource recovery, product longevity, take-back schemes, and supply chain transparency—offers a substantive basis for environmental claims that is both aligned with the EmpCo Directive's requirements and resonant with the values of environmentally conscious consumer segments.

**Conclusions and Recommendations**

This article has examined the phenomenon of greenwashing in European digital consumer markets, analysing the mechanisms through which misleading environmental claims erode consumer trust, the regulatory architecture through which the EU is addressing these failures, and the strategic implications for firms seeking to communicate environmental values credibly and compliantly.

Three principal conclusions emerge from the analysis. First, greenwashing is a systemic market failure driven by the structural gap between the commercial incentives to make environmental claims and the informational and verification mechanisms available to consumers. This gap is particularly acute in digital environments, where the speed, reach, and low cost of online communication amplify both the dissemination of misleading claims and the reputational consequences of their exposure. The five mechanisms of trust erosion identified—vague terminology, label inflation, carbon offset misrepresentation, selective disclosure, and digital amplification—operate across sectors and channels with significant consequences for consumer confidence in green communication.

Second, the EmpCo Directive 2024/825 represents a binding and consequential regulatory development that reshapes the legal and reputational risk environment for all firms making environmental claims in EU consumer markets. By prohibiting unsubstantiated green claims, regulating sustainability labels, and extending unfair practices law to environmental and social product characteristics, the Directive establishes a compliance framework that demands substantive changes to marketing practice, data infrastructure, and organisational governance. With enforcement commencing in September 2026, firms that have not yet initiated compliance reviews face significant exposure to regulatory penalty and reputational damage.

Third, regulatory compliance and authentic sustainability communication are not merely complementary but mutually reinforcing strategic imperatives. Firms that invest in the evidence-based communication required by the EmpCo Directive simultaneously build the consumer trust assets that constitute competitive advantage in sustainability-sensitive markets. The transition from aspirational to verifiable green communication, while demanding in operational terms, offers a pathway to durable brand equity and consumer loyalty that short-term greenwashing strategies cannot sustain.

For marketing practitioners and communication professionals, the practical recommendations are clear: audit current environmental claims against the EmpCo Directive's substantiation requirements before September 2026; establish cross-functional sustainability governance structures that integrate marketing, legal, and operational data; adopt only sustainability labels that meet public-authority or certified scheme standards; and invest in transparent, evidence-based communication strategies that acknowledge both achievements and ongoing challenges. For policymakers, the priority should be ensuring consistent national enforcement of the EmpCo framework and providing accessible guidance to SMEs, which face disproportionate compliance costs relative to larger competitors.

Future research should examine the differential impact of the EmpCo Directive across industry sectors and firm sizes, the effectiveness of AI-assisted compliance tools in preventing digital greenwashing, and the longitudinal dynamics of consumer trust recovery following greenwashing incidents in regulated markets.

## References


1. Aljebreen, M., Obayya, M., Mahgoub, H., Alotaibi, S. S., Mohamed, A., & Hamza, M. A. Chaotic Equilibrium Optimizer-Based Green Communication With Deep Learning Enabled Load Prediction in Internet of Things Environment. IEEE Access, 2024, 12, 258–267. https://doi.org/10.1109/ACCESS.2023.3345803
2. Bai, J., Yan, Q., Wang, H. M., & Liu, Y. Intelligent Reflecting Surface Aided Green Communication With Deployment Optimization. IEEE Transactions on Communications, 2024, 72(8), 5130–5144. https://doi.org/10.1109/TCOMM.2024.3379357
3. Bundesgerichtshof. Bundesgerichtshof entscheidet zur Zulässigkeit von Werbung mit dem Begriff „klimaneutral” (Pressemitteilung Nr. 138/2024, 27 June 2024). Karlsruhe: Bundesgerichtshof.
4. Cooley LLP. Empowering Consumers for the Green Transition Directive: Check Your Sustainability Claims and Warranty Information for Compliance With New EU Regime. Productwise, 16 March 2026. Available at: https://products.cooley.com (accessed 1 May 2026).
5. Crapa, G., Latino, M. E., & Roma, P. The performance of green communication across social media: Evidence from the large-scale retail industry in Italy. Corporate Social Responsibility and Environmental Management, 31(1), 493–513. https://doi.org/10.1002/csr.2581
6. Delmas, M. A., & Burbano, V. C. The Drivers of Greenwashing. California Management Review, 2011, 54(1), 64–87. https://doi.org/10.1525/cmr.2011.54.1.64
7. European Commission. (2018). Behavioural Study on Consumers' Engagement in the Circular Economy. Final Report. Brussels: European Commission.
8. European Commission. Proposal for a Directive on substantiation and communication of explicit environmental claims (Green Claims Directive). COM(2023) 166 final, 22 March 2023. Brussels: European Commission.
9. European Parliament. European Parliament legislative resolution of 12 March 2024 on the proposal for a directive on substantiation and communication of explicit environmental claims and environmental labelling schemes. 2023/0085(COD). Strasbourg: European Parliament.
10. European Union. Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and

through better information. Official Journal of the European Union, L, 2024/825, 6 March 2024.
11. Fitri, F. N., & Isa, M. Analisis Pengaruh e-WOM, Brand Attitude, dan Trust terhadap Purchase Intention Eco-Friendly Transport di Surakarta. Economic Reviews Journal, 2024, 3(1), 554–571. https://doi.org/10.56709/mrj.v3i1.128
12. Ghazanfari, A. (2023). An Analysis of Circular Economy Literature at the Macro Level, with a Particular Focus on Energy Markets. Energies, 16(4), 1779. https://doi.org/10.3390/en16041779
13. Islam, M. S., Azizzadeh, F., & Zupok, S. Business Research Process: Easing Beginners' Attempt. Journal of Contemporary Research in Business Administration and Economic Sciences, 2022, 1(4), 67–80.
14. Kirchherr, J., Reike, D., & Hekkert, M. Conceptualizing the circular economy: An analysis of 114 definitions. Resources, Conservation and Recycling, 2017, 127, 221–232. https://doi.org/10.1016/j.resconrec.2017.09.005
15. Korhonen, J., Honkasalo, A., & Seppälä, J. Circular Economy: The Concept and its Limitations. Ecological Economics, 2018, 143, 37–46. https://doi.org/10.1016/j.ecolecon.2017.06.041
16. Lyon, T. P., & Montgomery, A. W. The Means and End of Greenwash. Organization & Environment, 2015, 28(2), 223–249. https://doi.org/10.1177/1086026615575332
17. Mladenovic, M., van Trijp, H., & Piqueras-Fiszman, B. (Un)believably Green: The Role of Information Credibility in Green Food Product Communications. Environmental Communication, 2024, 18(6), 743–760. https://doi.org/10.1080/17524032.2024.2317910
18. Piwowar-Sulej, K., Popowicz, E., & Sulich, A. What is the link between internal communication, organizational culture and environmental strategy? The context of company size and employee perception. Central European Management Journal, 2024, 32(2), 301–319. https://doi.org/10.1108/CEMJ-06-2022-0073
19. Rabiu, M. K., & Jaeger-Erben, M. Reducing single-use plastic in everyday social practices: Insights from a living lab experiment. Resources, Conservation and Recycling, 2024, P. 200, 107303. https://doi.org/10.1016/j.resconrec.2023.107303
20. Rahaman, M., Haque, R., Alam, S., Zupok, S., Salahshour, S., Azizzadeh, F., & Mondal, S. P. Solvability Criteria for Uncertain Differential Equations and Their Applicability in an Economic Lot-Size Model with a Type-2 Interval Phenomenon. Symmetry, 2023, 15(10), 1883. https://doi.org/10.3390/sym15101883
21. Senken. Green Claims Directive: Current status and what companies should do now. Senken Academy. 2024, Available at: https://www.senken.io (accessed 1 May 2026).
22. Zhong, Z. Z., & Zhao, E. Y. Collaborative Driving Mode of Sustainable Marketing and Supply Chain Management Supported by Metaverse Technology. IEEE Transactions on Engineering Management, 71, 1642–1654. https://doi.org/10.1109/TEM.2023.3337346
23. Zupok, S., Dyrka, S., & Kapała, M. Sustainable Marketing: Integrating Environmental Values into Customer Communication. European Research Studies Journal, XXVIII(2), 2025, 868–884. https://doi.org/10.35808/ersj/4015.

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## ЕУРОПАЛЫҚ ЦИФРЛЫҚ НАРЫҚТАРДАҒЫ "ЖАСЫЛ ЖУУ" ҚҰБЫЛЫСЫ ЖӘНЕ ЕУРОПАЛЫҚ ОДАҚ ЕРЕЖЕЛЕРІ КОНТЕКСТІНДЕГІ ТҰТЫНУШЫЛАРДЫҢ СЕНІМІНІҢ ӨЗГЕРУІ

**Түйін**

Бұл мақалада Еуропалық цифрлық нарықтардағы "жасыл жуу" құбылысы ЕО-ның дамып келе жатқан нормативтік-құқықтық базасы контекстінде Зерттеліп, Тұтынушылардың "Жасыл" Экономикаға көшу Мүмкіндіктерін Кеңейту Жөніндегі 2024/825 Директивасына (EmpCo) ерекше назар аударылады. Құжатта жаңылыстыратын экологиялық талаптар тұтынушылардың сеніміне нұқсан келтіретін негізгі механизмдер анықталған, ЕО деңгейіндегі реттеуші органдардың жауаптары зерттелген және цифрлық тұтыну нарықтарында жұмыс істейтін фирмалар үшін стратегиялық салдары тұжырымдалған. Соңғы нормативтік құжаттарға, эмпирикалық зерттеулерге және тұрақты маркетингтік әдебиеттерге сүйене отырып, мақалада сенімді экологиялық коммуникация өршіл риторикадан шынайы ұйымдастырушылық келісіммен расталған тексерілетін, дәлелді мәлімдемелерге түбегейлі ауысуды талап етеді деп мәлімдейді. 2026 жылдың қыркүйегінен бастап Күшіне енетін EmpCo Директивасы барлық секторлардағы кәсіпорындардың сәйкестік міндеттемелері мен коммуникациялық стратегияларын өзгертетін міндетті құқықтық базаны белгілейді. Нәтижелер тұрақты маркетинг, тұтынушылардың сенімі және реттеуші басқару саласындағы стипендиялардың көбеюіне ықпал етеді және маркетологтарға, сәйкестік мамандарына және саясаткерлерге тиімді ұсыныстар береді.

**Кілттік сөздер:** "жасыл жуу", тұтынушылардың сенімі, EmpCo Директивасы, "жасыл байланыс", цифрлық нарықтар, тұрақты маркетинг.

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## ФЕНОМЕН "ЗЕЛЕНОЙ ВОЛНЫ" НА ЕВРОПЕЙСКИХ ЦИФРОВЫХ РЫНКАХ И ИЗМЕНЕНИЯ В ДОВЕРИИ ПОТРЕБИТЕЛЕЙ В КОНТЕКСТЕ НОРМАТИВНЫХ АКТОВ ЕВРОПЕЙСКОГО СОЮЗА

**Аннотация**

В этой статье исследуется феномен "зеленой волны" на европейских цифровых рынках в контексте меняющейся нормативно-правовой базы ЕС, с особым акцентом на Директиву 2024/825 о расширении прав и возможностей потребителей в целях перехода к "зеленой экономике" (EmpCo). В документе определены основные механизмы, с помощью которых вводящие в заблуждение экологические претензии подрывают доверие потребителей, проанализированы меры регулирования на уровне ЕС и сформулированы стратегические последствия для фирм, работающих на цифровых потребительских рынках. Опираясь на последние нормативные документы, эмпирические исследования и литературу по устойчивому маркетингу, в статье утверждается, что заслуживающая доверия экологическая коммуникация требует фундаментального перехода от амбициозной риторики к проверяемым, основанным на фактических данных заявлениям, подкрепленным подлинной организационной согласованностью. Директива EmpCo, вступающая в силу с сентября 2026 года, устанавливает обязательную правовую базу, которая изменяет обязательства по соблюдению требований и коммуникационные стратегии предприятий во всех секторах. Полученные результаты способствуют расширению научных знаний об устойчивом маркетинге, доверии потребителей и нормативно-правовом регулировании, а также являются практическим руководством для маркетологов, специалистов по соблюдению нормативных требований и политиков.

**Ключевые слова:** экологизация, доверие потребителей, директива EmpCo, экологичная коммуникация, цифровые рынки, устойчивый маркетинг.