

Greenwashing and Consumer Protection in India's Skincare Market: A Psycho-behavioural Framework for Regulatory Gaps

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Abstract

The growing trend of environmental and sustainability claims in India's skincare industry has increased concerns about greenwashing and its impact on consumer protection. Although the Consumer Protection Act, 2019 (CPA) and related advertising regulations provide a legal framework to address misleading environmental claims, their effectiveness remains limited because enforcement is largely disclosure-based and complaint-driven. This article examines greenwashing in the Indian skincare market by reviewing the CPA, 2019, allied regulatory guidelines, and insights from consumer behaviour research. It argues that existing regulations pay limited attention to the psychological factors that influence how consumers interpret sustainability claims. The article explains how visual and verbal cues, trust, emotional responses, and cognitive shortcuts shape purchasing decisions and increase consumers' vulnerability to misleading environmental marketing. It also identifies important regulatory gaps, including assumptions of rational consumer behaviour, reactive enforcement mechanisms, and the challenges faced by small and indigenous skincare businesses in meeting compliance expectations. To address these issues, the article proposes a psycho-behavioural framework that complements existing consumer protection law by incorporating behavioural insights into the evaluation of green claims. The framework

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offers practical guidance for policymakers, regulators, and marketers to encourage more transparent sustainability communication and strengthen consumer trust in India's growing green skincare market.

Keywords

Greenwashing, green skincare, consumer behaviour, consumer protection act, 2019; sustainability claims

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Introduction

In recent decades, green skincare has emerged as a significant trend within the skincare industry, driven by increasing consumer concern for environmental impact, ingredient safety, and ethical production practices, contributing to the global rise in popularity of green skincare products (Dangelico & Vocalelli, 2017). As of the early 2020s, the market for natural and organic personal care products was estimated at more than USD 13 billion and is expected to continue growing at a steady pace, with skincare a major driver of this growth (Grand View Research, 2023). This drift is especially strong in urban India, where fears of exposure to pollution and long-term health hazards collide with the growing environmental awareness among urban consumers (Joshi & Rahman, 2015; Kumar & Polonsky, 2019). According to industry estimates, the natural and ayurvedic beauty and personal care segment in India is expanding faster than conventional cosmetics, with both high-end brands and digital-native startups driving growth (KPMG, 2022).

Environmental positioning, however, is not the only distinguishable feature of green skincare. The breadth of market structure is equally pertinent. In other words, on one hand, this category encompasses high-end, globally based brands with certified organic and sustainably packed products, and on the other hand, it also includes an expanding ecosystem of small, homegrown, and artisanal businesses (Chin et al., 2018; Dini & Laneri, 2021). Whereas larger and established brands tend to use formalised sustainability signals (such as technical/scientific assertions, certification, etc.), smaller businesses tend to be founded on informal sustainability signalling, including handcrafted production, local production, or traditional knowledge, and need not be based on any formal eco-labels or third-party certification (Revell et al., 2010). Green skincare is therefore found in a spectrum between highly institutionalised sustainability claims and local/community-based affirmations of having natural/clean beauty.

Despite this growth, regulatory frameworks have not kept pace. Greenwashing is increasingly recognised as a consumer protection issue, with regulatory bodies introducing guidelines to address misleading environmental claims (Central Consumer Protection Authority [CCPA], 2022, 2024). However, enforcement remains uneven, and environmental claims are often ambiguous or difficult to verify (Kumar & Garg, 2021). Concurrently, legal commentaries have noted that

sustainability-linked trademarks and green branding strategies often operate in doctrinal grey zones of intellectual property and consumer law, enabling firms to signal environmental responsibility without substantive compliance (S.S. Rana & Co, 2024). These gaps are further complicated by the psychosocial dynamics of skincare consumption, in which trust, fear of chemical harm, and moral identity shape consumer decision-making.

Here, this article seeks to achieve three objectives that are interrelated. First, it analyzes the current legal ecosystem that regulates greenwashing in the Indian skincare industry, with a focus on the Consumer Protection Act (CPA), 2019, and the related advertising rules. Nonetheless, the discussion is not involved in doctrinal legal analysis, but places the CPA, 2019, into the wider context of the institution which forms consumer perceptions and marketplace conduct. Second, it builds on psychological understandings to comprehend the consumer psyche, which is likely particularly vulnerable to cues of greenwashing and manipulative sustainability claims. Third, it claims that the incorporation of behavioural knowledge can guide finer regulatory forms, the ones that safeguard consumers against fraudulent activities but are also mindful of the realities of small, homegrown green businesses. To achieve these objectives, the article is guided by the following research questions:

- RQ1. How do existing consumer protection and advertising regulations address greenwashing in India's skincare market, and what limitations remain?
- RQ2. What psychosocial factors make consumers vulnerable to greenwashing in the skincare market?
- RQ3. How can behavioural insights be integrated into consumer protection to address greenwashing in India's skincare market?

By addressing these questions, the article aims to contribute to the growing discourse at the intersection of consumer protection, consumer behaviour, and sustainability, while proposing a psycho-behavioural framework to strengthen the regulation of greenwashing in India's skincare industry.

Conceptualising Greenwashing in the Skincare Industry

As consumer demand for green skincare products has risen, the market has responded by reshaping its practices to emphasise attributes that signal sustainability and ethical consumerism (Grant, 2007; Ottman, 2011; Polonsky, 1994). Although this move is indicative of the emergence of green consumerism, it has also heightened greenwashing, undermining true sustainability and misguiding consumer decision-making. Greenwashing is defined as actions that deceive consumers about a product or brand's environmental performance, benefits, or ethical credentials (Peattie & Crane, 2005). Rather than genuine environmental responsibility, greenwashing is, in most cases, symbolic-based communication aimed at improving brand legitimacy and brand appeal in the market.

Researchers define greenwashing as a disconnect between a product's actual environmental performance and the sustainability-related claims communicated by the product firm (Delmas & Burbano, 2011). Greenwashing is a legitimacy-seeking strategy that enables companies to control stakeholders' perceptions without making significant environmental changes (Laufer, 2003; Lyon & Montgomery, 2015). Greenwashing is quite often operationalised within the consumer-behaviour lens as 'perceived environmental deception', which encapsulates the views of consumers that environmental assertions made are exaggerated, vague, or unfounded (Chen & Chang, 2013). These perceptions are important because they have a direct bearing on trust, attitude formation, and green purchase behaviour, especially in product categories characterised by high involvement and symbolic consumption (Hartmann & Apaolaza-Ibáñez, 2009).

In the skincare business, greenwashing takes on a rather convincing, convoluted form (de Freitas Netto et al., 2020). First, skincare products are used in contact with the human body, which increases the sensitivity of their consumers to risk, safety, and purity. The environmental claims thus overlap with assertions of health and wellness (Kapferer & Denizeau, 2014). Consequently, because of that, they become more perceived as valuable. Second, skincare sustainability narratives are more prone to confuse the regulatory boundary between cosmetics, health, and environmental responsibility, and leave consumers at a loss as to what constitutes a legitimate green claim (Parguel et al., 2011). Third, the sustainability attributes, like ethical sourcing, biodegradation or carbon neutrality, are largely intangible and are not visible when purchasing. Therefore, consumers have to evaluate green claims using marketing cues, brand narratives, and symbolic representations (Nelson, 1970). Indian skincare industry is particularly prone to greenwashing, as regulatory uncertainties, strong competition in the market, and psychosocial factors that drive consumer trust and desire intersect in this demanding industry.

Regulatory speech, the arguments in the fields of environmental and sustainability, are not well standardised and are not, in most cases, consistently implemented (Advertising Standards Council of India [ASCI], 2024; CCPA, 2024). The ASCI has provided guidelines to prevent misleading communication of green claims, but has few proactive and enforceable mechanisms to comply with the guidelines (ASCI, 2024). Consequently, brands still have a lot of interpretative latitude when it comes to the way they present sustainability. This regulatory vacuum has enabled the proliferation of vaguely defined terms like chemical-free, eco-safe or 100% natural to become commonplace, despite having no clear scientific or legal interpretation (ASCI, 2022; TerraChoice, 2010). This vulnerability is further enhanced by market dynamics. The drive to create digital-first and so-called masstige skincare brands has led to more dependence on influencer marketing and social media content, direct-to-consumer agencies and platforms. They also pay more attention to emotional appeal, aesthetic consistency and relatability instead of information disclosure and to the increased presence and believability of the superficially green content (Ajzen, 1991; Hartmann & Apaolaza-Ibáñez, 2009). The symbolic green indicators are more favoured than substantiated environmental processes that are saved and re-used via algorithmic prominence of

aesthetically appealing sustainability discourses. The consumer side is more responsive to green and natural claims due to increased health awareness, skin problems as a result of pollution, and self-care discourses following the pandemic (Joshi & Rahman, 2015). However, this increasing level of concern is not necessarily linked to a high level of environmental literacy, which creates a disparity between consumer expectations and their capacity to critically analyse or discern information. This landscape is further complicated by the fact that herbal and ayurvedic products are culturally connected with safety and authenticity. With no corresponding responsibility in ethical provision or environmental conservation, brands often borrow systems of indigenous knowledge in marketing communication, playing on symbolic rather than substantive environmental responsibility (Kumar & Polonsky, 2019).

Such enhanced exposure to greenwashing has far-reaching effects (Nyilasy et al., 2014; Seele & Gatti, 2017). The frequent repetition of misleading green claims confuses, distracts and erodes trust in consumers, leading to the attenuation of the connection between pro-environmental attitudes and actual green purchase behaviour (Testa et al., 2019). For consumers who consider ethical consumption to be an aspect of moral identity, when faced with misleading sustainability claims, they may experience moral dissonance and disengage or become cynical about sustainable consumption (Aquino & Reed, 2002). The tension in the skincare category is especially emotional since products are directly related to identity, body image, and self-esteem (Calogero et al., 2007). At the market level, greenwashing interferes with the competitiveness of the market by allowing superficial green brands to compete with sustainable brands that are not only fully compliant but also face higher costs of innovation. This undermines the spirit of true environmentalism and risks making sustainability just a marketing slogan and not a strategic course. The green standards will be diluted with time, and this will affect the integrity of green consumerism itself, particularly in a high-growth market such as skincare. In general, greenwashing is a burning issue in the Indian skincare industry, which occurs at the intersection of a lax regulatory control domain and practices, emotional marketing strategies over factual ones, and changing consumer awareness. The comprehension of how greenwashing works and what results it generates is crucial to decoding green purchase behaviour and to developing greenwashing-based interventions that would not only safeguard consumers but also would not undermine sustainability-focused marketing.

Table 1 indicates that the existing literature has made significant contributions to understanding greenwashing from the perspectives of environmental marketing, corporate communication, consumer trust, and sustainability strategy (Chen & Chang, 2013; de Freitas Netto et al., 2020; Delmas & Burbano, 2011). Although a growing body of research has examined green consumer behaviour and sustainability narratives in the cosmetics sector (Amberg & Fogarassy, 2019; Dini & Laneri, 2021), comparatively little attention has been paid to greenwashing in the skincare industry, where environmental claims frequently intersect with health, wellness, and personal care.

Existing studies have also tended to examine behavioural constructs such as green trust, perceived risk, or purchase intention independently, providing limited

Table 1. Summary of Key Studies on Greenwashing.

Author(s)	Study Focus	Key Contribution	Research Gap Identified
Chen & Chang (2013)	Greenwashing, green trust and consumer behaviour	Demonstrates that greenwashing reduces green trust by increasing consumer confusion and perceived risk.	Focuses on consumer behaviour broadly; does not examine skincare or regulatory responses.
Delmas & Burbano (2011)	Drivers of greenwashing	Explains organisational, institutional and market drivers that encourage greenwashing.	Limited attention to consumer psychology and sector-specific applications.
Nyilasy et al. (2014)	Green advertising and consumer responses	Shows that consumer perceptions depend on both environmental claims and firms' actual environmental performance.	Does not explore skincare-specific marketing or consumer protection implications.
de Freitas Netto et al. (2020)	Systematic review of greenwashing	Synthesises major concepts, forms and drivers of greenwashing across industries.	Limited discussion of skincare, behavioural mechanisms and regulatory design.
Seele & Gatti (2017)	Conceptualisation of greenwashing	Develops a typology of greenwashing and legitimacy strategies.	Focuses on conceptual classification rather than consumer vulnerability.
Amberg & Fogarassy (2019)	Green consumer behaviour in the cosmetics market	Explores determinants of environmentally conscious cosmetic purchasing.	Does not examine deceptive environmental claims or greenwashing.
Dini & Laneri (2021)	Natural cosmetics and sustainability narratives	Discusses how sustainability narratives differentiate brands in the clean beauty market.	Limited consideration of misleading sustainability communication.
Kumar & Polonsky (2019)	Greenwashing in emerging markets	Examines greenwashing challenges within emerging market contexts.	Does not provide sector-specific insights for skincare or regulatory analysis.
Kumar & Garg (2021)	Green marketing and greenwashing in India	Reviews emerging greenwashing issues and regulatory concerns in India.	Broad review with limited focus on skincare and consumer psychology.
Dangelico & Vocalelli (2017)	Green marketing strategies	Reviews sustainability communication and green marketing practices.	Limited discussion of misleading claims and consumer vulnerability.

understanding of how multiple psychosocial processes collectively shape consumers' interpretation of environmental claims (Chen & Chang, 2013; Nyilasy et al., 2014). Likewise, research on greenwashing has largely focused either on marketing and communication perspectives or on regulatory and legal issues, with relatively little integration of behavioural insights into consumer protection.

Furthermore, evidence from the Indian skincare market remains limited despite the rapid growth of sustainability-oriented skincare brands and increasing regulatory attention to environmental marketing claims (SPRF, 2024).

Accordingly, this article addresses three important gaps in the literature: (a) the limited understanding of greenwashing in the skincare sector, particularly in the Indian context; (b) the lack of an integrated explanation of the psychosocial mechanisms that shape consumer vulnerability to misleading environmental claims; and (c) the limited integration of behavioural science with consumer protection law in designing regulatory responses to greenwashing. By bringing together these perspectives, the article proposes a psycho-behavioural framework that complements existing regulatory approaches and contributes to a more consumer-centred understanding of greenwashing in India's skincare market.

CPA, 2019: Scope and Relevance to Green Claims

With the enforcement of the CPA, 2019, the consumer law in India is undergoing a major transformation that indicates the evolving aspects of the markets, advertisement and information asymmetry in the online economy. The Act is a pioneer in that it regulates the activities of marketing communication by going beyond the system of redress of grievances to the system of consumer rights, unfair trade and misleading advertisements, and in this way integrates into the regulation of marketing communication. The CPA 2019 can thus offer a legal base of paramount importance in the context of greenwashing, particularly in high-engagement, trust-formative sectors such as skincare, in the context of marketing sustainability.

Section 2(47) of the CPA 2019 describes unfair trade practices as any false or misleading statement in connection with the quality, standard, composition, usefulness, or benefits of goods and services. Greenwashing is not directly referred to in the Act, though clearly the environmental and sustainability-related claims are covered by the Act when such claims exaggerate or falsely represent their environmental benefits, safety of ingredients or sourcing policy.

Among the major institutional changes in the CPA 2019 is the establishment of the CCPA, which has the ability to intervene in misleading advertisements (under Section 21). The CCPA can guide the withdrawal or changes in advertisements, impose monetary fines on manufacturers and endorsers, and guide corrective advertising to overturn false impressions made on consumers. This is particularly true of the skincare marketing of today, with influencers, celebrities, and digital content creators playing a crucial role in validating the assertion of green and clean beauty. The act recognises the persuasive capability of mediated trust in influencing the perception of consumers by attributing the liability to the endorsers (Cialdini, 2009).

In addition, the CPA 2019 has made the green claims considerably more regulable as the CCPA published guidelines on greenwashing. In 2024, the Government of India announced the Guidelines on Prevention of Greenwashing under the CPA 2019; the first formal effort to explicitly regulate claims in advertising relating to environmental matters (Centre for Advocacy and Research, 2024). All false or misleading practices, such as in terms of visual, textual or symbolic representation,

which produce the impression of an environmentally responsible interest or exaggerate the benefits of sustainability, are considered to be greenwashing. The guidelines strongly discourage the use of vague, generalised terms like eco-friendly, green, or sustainable unless these assertions are supported by verifiable and available facts.

These guidelines are an important regulatory innovation as they extend beyond general prohibitions on misleading advertising to the form and content of green claims. According to the guidelines, the environmental claims should be true, specific, substantiated and verifiable by an independent body. They also discourage selective disclosure whereby a brand focuses on a single positive environmental feature and hides any negative environmental impacts. This applies specifically to the skincare sector where brands tend to advertise their ability to recycle their packaging, or to use plant-based ingredients, but never mention sourcing, chemical formulations and the environmental impact of the lifecycle.

Despite this greater regulatory transparency, there are still issues with enforcement. The practice of regulatory action pursuant to the CPA 2019 and the greenwashing guidelines is mostly reactive and complaint-based. Consumers bear the burden of identification and reporting, and they might not be technically skilled and knowledgeable in science or even aware of the law (Howells et al., 2018). This is also complicated in the skincare industry, where environmental and safety claims are framed in scientific or pseudo-scientific language that lay consumers would not be able to evaluate.

There are also a lot of green claims that lie in a grey zone of uncertainty as opposed to a falsehood zone. A green package, botanical icons, or any other references to nature-inspired formulas might give false impressions without justifiable assertions, which would clearly be contrary to the law. Even though the greenwashing principles are meant to combat these activities, their applicability in practice is dubious, in particular in the context of digital and influencer-driven marketing in which promo content is fragmented, temporary, and artificially optimised.

The digitisation of marketing practices complicates enforcement. Influencer, paid, and native advertising make it hard to distinguish between opinion and commercial promotion. The CPA 2019 imposes liability on the endorsers, but because of administrative challenges, it is hard to measure and regulate the quantity and rate of green claims created by influencers. Practically, consumer law is frequently applied when consumer injury or reputational damage has already taken place, limiting its prophylactic ability.

Overall, the CPA of 2019 offers a fundamental guideline on tackling green advertising within the Indian skincare market, as well as other guidelines on greenwashing. Yet there is an obvious disconnect between what the law aims to achieve and what actually transpires. This is relevant to green purchase behaviour researchers since consumers are in a market with the existence of these laws, but they may not always act on them. Thus, the influence of trust, risk, and credibility aspects on consumer reaction to green advertisements is considerably large. This is significant since it is necessary to know the bigger picture within which consumer reactions to greenwashing are interpreted.

Regulatory Ecosystem Beyond the CPA, 2019

Even though the CPA, 2019, provides the principal statutory framework for addressing misleading advertisements and unfair trade practices, the regulation of green skincare claims in India operates within a broader and more fragmented regulatory ecosystem (Kumar & Garg, 2021). This ecosystem comprises sector-specific legislation, advertising self-regulation, and voluntary certification mechanisms that collectively influence how sustainability-related claims are communicated and interpreted in the marketplace. Together, these instruments shape the institutional environment within which green skincare brands develop and disseminate sustainability narratives.

One of the key statutory instruments intersecting with green skincare claims is the Legal Metrology Act, 2009, which governs the quantity, weight, and labelling of packaged commodities. Although the Act does not explicitly regulate environmental or sustainability claims, it indirectly contributes to consumer protection by requiring accurate labelling and preventing misleading statements regarding product quantity, composition, or other measurable attributes. In the skincare industry, where green positioning is often accompanied by claims relating to purity, ingredient concentration, or product quality, these provisions provide a basic level of consumer protection. However, the Act is limited in its ability to address symbolic, qualitative, or value-based environmental claims, which generally fall outside its scope.

Another important component of the regulatory ecosystem is advertising self-regulation. The ASCI issued the *Guidelines for Advertisements Making Environmental/Green Claims* (2024), which provide a dedicated framework for evaluating environmental claims in advertising (ASCI, 2024). The guidelines discourage vague, absolute, or unqualified claims such as *100% eco-friendly*, *completely sustainable*, or *environmentally harmless* unless supported by robust and verifiable evidence. They also require advertisers to clearly disclose the basis of environmental claims and avoid exaggeration or omission of material information that may mislead consumers. These principles are particularly relevant to the skincare industry, where marketing communication frequently relies on claims relating to natural ingredients, sustainability, ethical sourcing, biodegradability, and product safety.

Although the ASCI guidelines play an important role in promoting responsible advertising practices, they remain part of a self-regulatory framework. ASCI may recommend the modification or withdrawal of advertisements found to be inconsistent with its Code or Guidelines, but it does not possess statutory powers to impose monetary penalties or other legal sanctions. Moreover, enforcement remains largely complaint-driven, with investigations generally initiated following complaints received from consumers, competitors, or other stakeholders. Consequently, proactive monitoring of environmental claims remains limited, particularly in rapidly evolving digital marketing environments where sustainability messaging is increasingly disseminated through social media, influencers, and short-form digital content.

In addition to the CPA, 2019 and the ASCI guidelines, the CCPA has strengthened consumer protection through the *Guidelines for Prevention of Misleading*

Advertisements and Endorsements for Misleading Advertisements (2022), which reinforce the requirement that advertising claims should be truthful, adequately substantiated, and not likely to mislead consumers (CCPA, 2022). Although these guidelines are not specific to environmental claims, they provide an important regulatory basis for evaluating deceptive sustainability-related advertising in the skincare sector.

Another important challenge within the regulatory ecosystem is the absence of a dedicated mandatory eco-labelling framework for cosmetics and skincare products in India. Unlike certain food and agricultural products, where certification systems are relatively well established, skincare brands often rely on voluntary domestic or international certification schemes, proprietary sustainability labels, or self-declared environmental claims. This diversity of certification practices can create consumer confusion and allows firms considerable discretion in selecting the standards they communicate, thereby increasing the potential for symbolic sustainability positioning rather than demonstrable environmental performance (Amberg & Fogarassy, 2019).

The coexistence of statutory legislation, advertising self-regulation, and voluntary certification mechanisms also complicates regulatory accountability. Differences in legal authority, enforcement mechanisms, and evidentiary requirements may create opportunities for strategic compliance, allowing businesses to satisfy certain regulatory requirements while continuing to communicate ambiguous or emotionally persuasive environmental messages. For instance, a skincare advertisement may comply with labelling requirements while simultaneously relying on vague environmental imagery or sustainability-related language that substantially shapes consumer perceptions without making objectively verifiable claims. These challenges are further amplified in digital marketing environments, where influencer endorsements, social media content, and rapidly changing promotional formats make regulatory oversight increasingly complex.

In summary, the regulation of green skincare claims in India extends well beyond the CPA, 2019 and encompasses statutory legislation, advertising self-regulation, and voluntary certification mechanisms. While these instruments collectively provide an important foundation for consumer protection, the regulatory architecture remains fragmented, with varying levels of legal authority and enforcement. This broader institutional context is critical for understanding green purchase behaviour because consumer responses to sustainability claims are influenced not only by personal attitudes and values, but also by the perceived credibility of regulatory institutions, the visibility of enforcement, and the trustworthiness of environmental communication.

Regulatory Gaps and the Need for a Psycho-behavioural Perspective in Green Skincare

While the regulatory environment in India has improved in recent years to address greenwashing, certain gaps in the regulation of green skincare advertising remain. Provisions such as the CPA (2019), with complementary regulations, may be used to frame the boundaries of acceptable advertising claims; however, there are structural,

interpretational, and behavioural gaps. The gaps are more apparent in skincare advertising, as consumption is closely linked to health, identity, and emotional regulation. The behavioural mechanisms and corresponding regulatory challenges are outlined in Table 2.

Table 2. The Behavioural Architecture of Skincare Claims and Regulatory Misalignment.

Category	Tactical Implementation (the Cue)	Psychological Mechanism (the Reality)	Regulatory Challenge (the Gap)
Visual & verbal cues	Botanical imagery: Leaf icons, 'earth-toned' matte packaging, and pseudo-scientific 'clean' stamps.	The Halo Effect: Consumers subconsciously transfer the 'purity' of the image to the chemical safety of the product.	Symbolic Overload: Hard for regulators to penalise 'vibe-based' marketing that avoids explicit false claims.
Perceived risk & health anxiety	Fear-based labelling: 'Toxic-free' or 'No Nasties' combined with 'Clinical' fonts for sensitive skin.	Affect Heuristic: Anxiety-driven purchasing leads to lower scepticism; the 'need' for a cure overrides the 'want' for a luxury.	Vulnerability Exploitation: Traditional 'average consumer' standards fail to protect those in a state of heightened health stress.
Heuristic decision-making	Simplified Icons: '100% Natural' stamps; 'Chemical-free' claims; familiar 'Eco' symbols.	Availability, Representativeness & Affect: Users substitute complex safety data for mental shortcuts based on what 'looks' safe or is easily recalled.	System 1 Thinking: Disclosure-heavy labels fail because consumers do not engage their analytical 'System 2' brain.
Trust & social validation	Influencer Endorsements: 'Science-backed' testimonials and viral 'Before & After' social media posts.	Social Proof: The belief that if many others (or a trusted peer) use it, the inherent risk is mitigated.	Decentralised Deception: Hard to regulate individual 'organic' endorsements compared to brand-led TV ads.
Ethical identity & moral satisfaction	Mission Statements: Claims of 'Giving Back' or 'Empowering Women' integrated into the brand story.	Identity Maintenance: The purchase becomes a tool for the consumer to signal their own virtues to themselves and others.	Subjective Standards: Defining 'misleading' is harder when the 'benefit' is the consumer's own moral feeling.
Warm-glow effect	Premium Pricing for 'Ethics': Marketing that emphasises the 'feel-good' nature of a conscious purchase.	Impure Altruism: The emotional utility gained from the act of 'doing good' overrides rational price or quality comparisons.	Value-Action Gap: Consumers may pay more for a 'glow' that is not backed by verifiable environmental or health data.

One major gap in the current regulatory approach is the focus on verifiability and literal misrepresentation (CPA, 2019; CCPA Greenwashing Guidelines, 2024). While current laws are fairly effective at addressing overt forms of deception, they are less well-suited to addressing the more psychologically powerful tactics often employed in the marketing of green skincare products (Seele & Gatti, 2017). Greenwashing in the skincare industry often involves implication rather than direct assertion, using the language of nature, wellness, and moral virtue to imply safety, purity, or superiority without making any concrete claims that can be tested for their validity (Parguel et al., 2011). Such strategies are constantly authorised to elude the strict legal definition of misleading advertising, despite their significant influence on consumer perceptions and purchasing decisions.

The second gap concerns the assumption of a rational consumer who is fully informed in regulatory frameworks (Kahneman, 2011). Consumer protection statutes primarily rely on complaint-based enforcement, an implicit assumption that consumers are in a position both to identify misleading representations and to have the desire and the literacy to seek remedies. In the context of green skincare, this supposition cannot be held true because claims about the environment and the ingredients of skincare products are often highly technical, scientifically unclear, or embedded in wellness literature, making it difficult to appraise them critically. The ensuing gap between regulatory pressure and consumer power undermines the protective effectiveness of the current legal system.

Regulatory efforts also fail to grasp the effective and identity-based dimensions of skincare product consumption (Amberg & Fogarassy, 2019). Skincare products are not just any product; they have a close relation to self-care, the perception of one's body, and moral responsibility. In these situations, green claims tend to be conflated with health and ethical self-representation, thereby increasing their persuasiveness. Regulatory efforts that focus on the informational accuracy of claims fail to grasp how sustainability-related signals are understood by consumers through their emotions and trust.

These challenges are further complicated by the structure of the skincare market itself. India has been witnessing a growing number of small, home-based, and artisanal skincare businesses (Ministry of Micro, Small and Medium Enterprises [MSME], 2024; Social and Political Research Foundation [SPRF], 2024) that may be acting in an environmentally responsible manner but lack the financial, technical, or institutional resources to obtain third-party eco-labels or certifications (Johnson, 2015). A regulatory regime that favours labels would impose disproportionate costs on these actors and may result in the marginalisation of genuinely sustainable small businesses, perhaps allowing larger businesses to engage in performative compliance through expensive certification activities. Such an imbalance clouds the distinction between green and greenwashed, highlighting the shortcomings of an approach that emphasises formal indicators over perceived and experienced authenticity.

These regulatory failures highlight the need to adopt a combined psychological-behavioural approach to understanding greenwashing in the skincare industry. Against this backdrop, the present study moves beyond viewing greenwashing solely as a regulatory problem and instead conceptualises it as a psycho-behavioural

experience embedded in everyday skincare consumption. By examining how consumers psychologically interpret and respond to green claims, this article aims to develop a behaviourally informed framework that can provide valuable insights for more effective regulatory policies.

Methodology

This article adopts a critical and interdisciplinary inquiry into the regulation of greenwashing in the Indian skincare sector. It combines a contextual statutory and regulatory analysis of the CPA, 2019, and related guidelines, as well as advertising self-regulatory instruments, with insights from consumer psychology and behavioural research. The analysis examines how regulatory assumptions align with consumers' lived interpretations of green skincare claims and culminates in a psycho-behavioural framework to aid and improve the existing regulatory ecosystem.

Psycho-behavioural Determinants Shaping Consumer Interpretation of Green Skincare Claims

The consumption of green skincare products is driven by a specific psycho-behavioural process that distinguishes it from other forms of green consumption. The human decision-making process in such scenarios is hardly the result of rational choice; instead, consumers process information through cognitive filters influenced by heuristics, affect, and risk perceptions (Kahneman, 2011; Schmitt et al., 2018). In the skincare industry, where products are in direct contact with the body and closely linked to notions of health, purity, and self-care, these cognitive filters intersect with health perceptions, environmentalism, and identity (Sunstein, 2016). This makes consumers highly vulnerable to deceptive sustainability information. It is critical to understand the role of these psychobehavioural processes in shaping the interpretation and validity of green claims to explain the ongoing phenomenon of greenwashing in the skincare industry, despite consumer protection legislation.

The proposed framework is not derived from a single behavioural theory. Instead, it adopts an integrative psycho-behavioural perspective that brings together complementary insights from behavioural economics, consumer psychology, signalling theory, and trust research to explain how consumers interpret environmental claims in the skincare market. This approach recognises that consumer responses to green claims are influenced not by one psychological mechanism alone, but by the interaction of cognitive shortcuts, affective responses, social influences, perceptions of credibility, and ethical self-perceptions.

Specifically, the framework draws on behavioural economics to explain heuristic decision-making under conditions of limited information (Kahneman, 2011; Tversky & Kahneman, 1974); the affect heuristic to explain how emotions associated with health, purity, and sustainability influence judgement (Slovic et al.,

2007); signalling theory to understand how environmental claims, eco-labels, and brand narratives function as signals of product quality in situations of information asymmetry (Akerlof, 1970); and trust theory to explain how perceived credibility shapes consumer responses to sustainability claims (Morgan & Hunt, 1994). Together, these complementary theoretical perspectives provide the conceptual foundation for the psycho-behavioural framework proposed in this article.

Green skincare marketing often uses a range of visual and verbal cues, such as botanical imagery, earth-toned packaging, allusions to natural or ayurvedic formulas, and symbolic associations with environmental friendliness. As mentioned above, these cues activate cognitive and affective shortcuts, the most notable of which is the halo effect, in which a single positive feature or characteristic (eco-friendly packaging) leads people to perceive the product as safer, more ethical, or more effective in general (Nisbett & Wilson, 1977). These inferences are common, even without a thorough examination of the products or the evidence supporting the assertions.

The perceived risk and health-related anxiety about the body is another significant psycho-behavioural driver. Since the products are placed on the skin and are used over and over again, consumers are especially wary of claims regarding ingredients and long-term health effects. Concerns about contamination, chemicals and hormonal imbalances put fears into the limelight, elevating such labels as non-toxic, chemical-free, and dermatologically safe. The studies on risk perception and consumer behaviour show that individuals with health-related anxiety have been employing emotional and heuristic processes instead of a rational cognitive appraisal (Jacoby & Kaplan, 1972; Loewenstein et al., 2001; Slovic et al., 2007). The marketing of green skincare products tends to provide the health benefits implicitly connected with the environmental claims, and the boundaries between skincare usage and health-related preventive behaviour are unclear (Hartmann & Apaolaza-Ibáñez, 2009). These health-related fears can be used by brands to boost perceptions of safety and superiority, with the sustainability stories being used despite the fact that the claims are only partially substantiated.

The decision-making process is heuristic and makes consumers more susceptible to greenwashing in skincare. Under the pressure of complex product details and various claims online and offline, consumers are likely to use mental shortcuts to evaluate safety, efficacy, and ethicality (Tversky & Kahneman, 1974). Precisely, the availability heuristic leads consumers to make judgements concerning safety or sustainability based on the most convenient or memorable information accessible, like influencer marketing, posts on viral social media, or frequent advertising of so-called natural ingredients. The representativeness heuristic leads to consumers judging the quality of a product by the surface similarity to an idealised prototype of a green product, like the assumption that a cream with botanical graphics or earthy packaging must be safe or green. The affect heuristic also affects the decision-making process, where positive emotional reactions to the product aesthetics or brand story are associated with the evaluation of ethicality and health benefits. This way, consumers can be misled into thinking that an ayurvedic-inspired lotion is eco-friendly and healthy on sensitive skin without reviewing ingredient labels or third-party certifications. The skincare industry, where items are put on the human body and relate to health and self-care behaviour,

is a sector in which misleading, exaggerated or partially truthful green claims are systematically amplified by the use of heuristic-based decision-making.

Trust and social validation prove to be extremely important psycho-behavioural motivators of consumer reactions to green skincare claims. Social media influencers, consumer reviews, and well-designed brand stories on social media are one of the most efficient sources of social validation in the online market, which, in turn, leads to consumer perceptions of product safety, ethics and environmental sustainability. Trust is viewed as transferred vicariously between credible sources of information like health influencers, dermatology-related content creators, or environmentally conscious online communities, and the product itself and is further supported by repetition and consistency in the storytelling. Experiments with behaviour have indicated that social validation and cues of authority are more likely to override the facts in experiential markets like those in skincare, where the outcomes of product use are subjective and hard to test (Cialdini, 2009). The information asymmetry is increased even further by the trust-based decision-making process, which undermines the corrective action of post-purchase dissatisfaction (Darby & Karni, 1973; Stiglitz, 2000). Misconceptions about product information based on trust and that are socially validated are therefore addressed by regulatory policies that are based on customer complaints and corrective disclosures.

Lastly, ethical self-identity and moral satisfaction greatly influence the use of green skincare products. Green products are commonly posed as a means of consumers demonstrating their environmental accountability and aligning consumption to their individual values. This may cause a warm-glow effect, in which the consumption itself is moral satisfaction, based on the actual environmental impact of the product consumed (Thaler & Sunstein, 2008). Under such a condition, the scepticism regarding the green claim can be lowered since doubting the claim is doubting the moral self-concept of the consumer.

All these combined are indicative that greenwashing in the skincare industry is not merely a case of pretence by brands but a type of behavioural control. They also expose inadequacies of regulatory policy which rests primarily on the principles of disclosure, informed consent, and rational consumer choice. By doing so, a proper legal reaction must take into account the psychological and emotional framework of understanding and interpreting green skincare statements (Sunstein, 2016; Thaler & Sunstein, 2008).

Behaviourally Informed Regulatory Framework for Green Skincare Claims

This section presents a psychologically and behaviourally informed regulatory framework to address greenwashing in the Indian skincare market. The framework is based on the assumption that consumer harm is not only caused by misleading or unverifiable information but also by the strategic exploitation of predictable cognitive and emotional processes. While the CPA, 2019, provides a strong doctrinal basis for dealing with the problem of misleading advertisements, it does so with the implicit assumption that consumers behave in a rational

and well-informed manner. The proposed framework seeks to improve and further develop existing consumer protection mechanisms by better aligning them with the actual processes by which consumers make sense of green skincare claims.

Behavioural Architecture and Consumer Vulnerability

The framework revolves around the behavioural architecture of green skincare consumerism. As it is explained above, the functions of cognitive heuristics, health-related anxieties, decision-making based on trust, and moral identity are to minimise the possibilities for consumers to critically evaluate information. This results in structural vulnerability where truthful or partly truthful claims can be misleading when used tactfully. The regulatory framework, which deals only with falsehoods of fact or literal misrepresentation, is ineffective in dealing with this element of consumer misrepresentation.

Regulatory Blind Spots in Existing Legal Instruments

Misleading advertisements are regulated by the CPA 2019 via post-regulatory enforcement, substantiation requirements, and corrective actions. Although the CCPA is empowered by Section 21 of the CPA to undertake measures against misleading advertisements, the enforcement process is mostly complaint-based. The consumer behaviour data also hints that consumers will not challenge the false green skincare claims because of the confusion of its harmful effects, the lack of technical understanding and a strong belief in sustainability or green-friendly stories. Moreover, disclaimers and fine-print corrections, the most widely used ways of controlling advertisement are behaviourally insignificant after the first impression has been made. The differences between regulatory assumptions and observed behavioural realities are presented in Table 3.

Table 3. Depicting Regulatory Assumptions Versus Observed Behavioural Realities.

Regulatory Assumptions	Observed Behavioural Realities
Rational, Informed Choice: Consumers systematically process all available data to maximise utility.	Heuristic-Driven Decision-Making: Consumers rely on mental shortcuts (availability/affect) to navigate complex choices.
Disclosure Ensures Clarity: More information and fine-print mandates lead to better-protected consumers.	Initial Impressions Dominate: Visual cues and 'green' branding create 'halo effects' that override technical disclosures.
Complaints Signal Harm: A lack of formal consumer complaints indicates a functioning, safe market.	Harm Often Internalised: Vulnerable consumers may blame themselves for product failure or remain unaware of long-term risks.
Economic Loss is Primary: Regulation focuses on price transparency and preventing financial 'rip-offs'.	Psychological Harm is Central: Marketing exploiters target health anxiety and self-identity, causing non-monetary distress.

Self-regulatory codes like the guidelines that the ASCI has on green advertising also presuppose that consumer misclassification can be reprimanded by better wording and self-regulation. Nonetheless, this methodology overlooks the inertia of heuristic-based beliefs and the accumulating impact of recurrent exposure to emotionally appealing green advertising stimuli on digital and social media.

Behavioural Responsive Control Design

An informative framework based on behaviour necessitates a paradigm shift in information correction to choice architecture intervention. In terms of skincare, this would lead to more regulatory attention on green claims relating to products that are to be applied to the body, with health risks and safety concerns being most evident. Regulatory requirements are to be directed toward claims which implicitly mention purity, safety or harm avoidance, where no explicit medical or therapeutic claims are present.

One of the critical choice architecture interventions is to standardise commonly used terms, including natural, clean, non-toxic, and eco-friendly. Behavioural science theorises that ambiguity enhances the use of subjective interpretation, which favours marketers over consumers. Simplified, cognitively accessible eco-disclosures are probably more effective in mitigating misinterpretation than longer or technical disclosures.

Preventive and Active Enforcement

Considering the compound effect of greenwashing, the policies enforced should be changed to be more responsive and proactive. The behavioural influence of misleading conduct can be countered by proactive observation of the market, industry-related advisory, and pattern-based enforcement measures prior to its systematisation as social norms. It is interesting to note that even with no economic loss, repeated cases of misleading behaviour should receive regulatory attention because of the gradual effect of behavioural exposure of repeated exposure.

Regulatory Proportionality and Sensitivity to Small Enterprises

A characteristic feature of the green skincare market is the development of small, local, and craft-based companies not subject to the certification system. These companies often use unofficial sustainability statements that rely on traditional knowledge, local sourcing or artisanal production instead of third-party eco-certification. An informed regulatory framework based on behaviour should thus be able to differentiate strategic greenwashing by advanced firms and well-meaning and informal sustainability assertions of small businesses.

Compliance by tiers like guidance notices, capacity building, and phased standards can also enhance consumer protection outcomes without overwhelming

the emerging businesses. This policy is aligned with consumer welfare and the overall aim of sustainable and inclusive market development.

The proposed framework shifts the focus of consumer protection law to real-world decision-making by systematically integrating psychological and behavioural processes into regulatory design. Instead of challenging current legal standards, it supports them by promoting a proactive, proportionate, and contextually informed approach to regulation that is equipped to address greenwashing in a complex, dynamically shifting skincare market. The key components of the proposed psycho-behavioural framework are presented in Table 4.

Illustrative Application of the Proposed Psycho-behavioural Framework

To demonstrate the practical application of the proposed framework, Table 5 presents illustrative examples drawn from selected skincare brands. These examples are based on publicly available brand communications and regulatory reports and are intended to show how the proposed framework may be used to evaluate sustainability-related marketing practices/claims. They should not be interpreted as legal findings or definitive determinations of regulatory compliance, but rather as illustrations of how behavioural and consumer protection principles may be applied to real-world communication strategies.

The examples presented in Table 5 illustrate how the proposed psycho-behavioural framework can be applied to evaluate sustainability-related communication in the skincare industry. The examples of Minimalist and Juicy Chemistry illustrate communication practices that place greater emphasis on transparency, evidence, and independent verification (The Case Centre, n.d.). Detailed ingredient disclosures, publicly accessible laboratory reports, internationally recognised third-party certifications, and product traceability provide consumers with verifiable information that supports informed decision-making. Such practices reduce dependence on heuristic cues and strengthen trust and social validation, while enabling consumers to evaluate sustainability claims beyond persuasive visual

Table 4. Psycho-Behavioural Framework for Regulating Green Skincare.

Stage	Key Components
Psycho-behavioural determinants	Cognitive Shortcuts: Heuristics (availability, representativeness, and affect), trust cues, health anxiety, and social validation.
Consumer vulnerability	The Impact: Information asymmetry and misplaced trust leading to reduced scepticism and a false sense of ethical/safety security.
Regulatory blind spots	Systemic Gaps: Over-reliance on ‘rational choice’ models, disclosure-heavy compliance, and reactive (post-hoc) enforcement.
Tailored legal responses	The Solution: Context-sensitive interpretations, tiered substantiation standards, and proactive scrutiny of marketing cues.

Table 5. Illustrative Application of the Proposed Psycho-behavioural Framework to Selected Skincare Brand Communications.

Illustrative Category	Brand/Communication Example	Relevant Psycho-behavioural Determinant(s)	Illustrative Assessment
Illustrative examples demonstrating stronger alignment with the proposed framework	Minimalist: Product communication emphasising complete ingredient disclosure, identification of ingredient suppliers, independent laboratory testing, and publicly accessible batch-specific reports.	Trust and social validation; Heuristic decision-making	By providing detailed, verifiable product information and third-party evidence, the communication encourages consumers to rely on objective information rather than heuristic cues or symbolic sustainability claims, thereby strengthening trust.
	Juicy Chemistry: Product communication supported by Ecocert COSMOS certification, ingredient traceability, annual third-party audits, and transparent disclosure of organic ingredient composition.	Visual and verbal cues; Trust and social validation	The use of internationally recognised certification, traceability information, and transparent sustainability communication provides credible visual and verbal cues that enhance consumer trust while reducing the likelihood of misleading environmental interpretations.
	Mamaearth Vitamin C Daily Glow Sunscreen (Honasa Consumer Limited): Included in the ASCI Personal Care complaints data (2025–2026) under advertisements requiring modification.	Perceived risk and health anxiety; Heuristic decision-making	Marketing communication for skincare products often combines wellness and environmental cues. The framework highlights the importance of ensuring that such claims are supported by clear and verifiable evidence to minimise consumer confusion and heuristic interpretation.
Illustrative examples highlighting communication practices requiring careful evaluation under the proposed framework	Garnier Super UV Invisible Serum Sunscreen/L'Oréal Paris Glycolic Bright Serum (L'Oréal India Pvt. Ltd.): Included in the ASCI Personal Care complaints data (2025–2026) under advertisements requiring modification.	Visual and verbal cues; Ethical identity and moral satisfaction	Sustainability-related wording and imagery may shape consumers' perceptions of environmental responsibility and ethical consumption. The framework emphasises that such claims should be specific, transparent, and adequately substantiated to support informed consumer decision-making.

and verbal cues (ASCI, 2024; Chen & Chang, 2013; Ecocert Greenlife, n.d.; Juicy Chemistry, n.d.; Minimalist, n.d.; Morgan & Hunt, 1994).

Conversely, the examples drawn from the ASCI Personal Care Complaints Data (2025–2026), including Mamaearth Vitamin C Daily Glow Sunscreen and Garnier Super UV Invisible Serum Sunscreen/L'Oréal Paris Glycolic Bright Serum (Garnier India, n.d.), demonstrate why sustainability and wellness-related claims require careful behavioural evaluation. Because skincare products are directly associated with health, safety, and personal well-being, such claims may activate perceived risk and health anxiety and encourage heuristic decision-making, particularly when consumers rely on broad environmental messaging, symbolic representations, or simplified product cues rather than independently verifiable information (Loewenstein et al., 2001; Slovic et al., 2007; Tversky & Kahneman, 1974). These examples therefore highlight the importance of ensuring that environmental and product-related claims are communicated with sufficient clarity, specificity, and supporting evidence to minimise consumer misunderstanding (ASCI, 2024, 2025).

Overall, the proposed framework complements existing consumer protection and advertising regulations by extending the assessment of green claims beyond legal compliance alone. By integrating insights from consumer psychology with consumer protection principles, it provides regulators, businesses, and policy-makers with a structured approach for identifying communication practices that may increase or reduce consumer vulnerability to greenwashing. In doing so, the framework encourages greater transparency, substantiation, and accountability in sustainability communication while supporting more informed and responsible consumer decision-making (de Freitas Netto et al., 2020; Nyilasy et al., 2014; Seele & Gatti, 2017).

Key Implications

This research examines greenwashing in the Indian skin care industry as a consumer protection issue arising from regulatory design, market practices, and consumer attitudes. It is evident that while the CPA, 2019, and other regulatory frameworks establish a legal framework to address the issue of deceptive environmental claims, they are not very effective in situations where consumer choice is informed by trust, symbolism, and health risk rather than a detailed assessment of information.

In terms of consumer rights, greenwashing poses a threat to the right to information and to choice. Misleading environmental claims that overemphasise sustainability or health and safety without sufficient support undermine consumer autonomy by leading consumers to make choices based on impression and inference rather than informed consent. The CPA 2019's emphasis on unfair trade practices and consumer well-being provides a strong foundation for understanding greenwashing as a material issue of consumer harm rather than a marginal concern in advertising regulation.

The negative consequences of greenwashing go beyond economic harm. Greenwashing can create anxiety, moral distress, and trust erosion as consumers notice discrepancies between advertised sustainability and reality. These

non-economic consequences are especially relevant in product segments that are linked to personal care, identity, and ethical consumption. Consumer protection policies that focus too narrowly on economic distortion may overlook the psychological aspects of harm.

At the same time, regulatory policies must be mindful of market heterogeneity. The co-presence of large corporations that engage in performative compliance and smaller, indigenous businesses that use grassroots sustainability storytelling makes it difficult to focus solely on certification-based solutions. Improved understanding of commonly used green terms, increased scepticism toward claims that tacitly convey safety or health-related messages, and active sector guidance can help improve enforcement without unduly burdening smaller businesses.

By placing greenwashing within a behaviourally informed consumer protection framework that accounts for both informational and psychological harms, this research contributes to an emerging literature on how legal regulation can better govern sustainability claims in markets where trust, identity, and care intersect.

Limitations and Future Research

This study has certain limitations that should be acknowledged. First, the article adopts a conceptual and regulatory approach and does not empirically test the proposed psycho-behavioural framework. Future research may validate the framework using quantitative or qualitative studies involving consumers of green skincare products. Second, the discussion is situated within the Indian skincare market and regulatory environment; comparative studies across countries or product categories may provide further insights into how institutional contexts influence consumer responses to greenwashing. Third, although the article synthesises behavioural and legal perspectives, other relevant factors, such as digital platform governance, influencer marketing, artificial intelligence-driven advertising, and cross-border sustainability claims, remain beyond its scope.

Future research could also examine the effectiveness of behaviourally informed regulatory interventions, including improved environmental disclosures, standardised sustainability terminology, warning labels, or consumer education initiatives. Such work would contribute to the development of evidence-based consumer protection strategies capable of addressing the evolving nature of greenwashing in sustainability-oriented markets.

Conclusion

This article examined greenwashing in India's skincare industry through the combined lenses of consumer protection law and behavioural science. While the CPA, 2019, together with related advertising regulations, provides an important legal framework for addressing misleading environmental claims, the analysis demonstrates that existing regulatory architecture remains largely fragmented, disclosure-oriented and assumes that consumers make rational and informed

decisions. Such assumptions do not adequately reflect the realities of skincare consumption, where purchasing decisions are frequently shaped by trust, emotions, health concerns, and symbolic meanings associated with sustainability.

Drawing on insights from consumer protection, behavioural economics, and consumer psychology, this article proposed a psycho-behavioural framework to explain how heuristics, perceived risk, trust, social validation, and moral identity influence consumer interpretation of green skincare claims. By integrating behavioural insights with legal analysis, the framework extends existing approaches to greenwashing beyond questions of regulatory compliance to consider the psychological processes that shape consumer vulnerability.

The article contributes to the growing discourse on sustainable consumption by highlighting the need for consumer protection policies that recognise both informational and behavioural dimensions of greenwashing. As environmental marketing continues to expand in India's skincare industry, behaviourally informed regulatory approaches can help promote greater transparency, strengthen consumer trust, and support genuinely sustainable business practices.

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