

P&G Accused of Greenwashing and Creating “Frankenforests”

Katie Rogers, Gonzalo E. Mon

February 3, 2025

Earlier this month, a group of eight consumers filed a class action against Procter & Gamble (“P&G”), alleging that the company is engaging in greenwashing by misleading consumers into thinking that its Charmin toilet paper is ethically sourced and that the company is following through with its sustainable reforestation promises.

The complaint alleges that P&G makes three key promises it cannot keep as part of its “Keep Forests as Forests” campaign and its “Protect-Grow-Restore” logo: (1) that it only uses pulp certified by the Forest Stewardship Council (or “FSC”), in support of the “Protect” promise; (2) that for every tree used, at least two are regrown in its place, in support of the “Grow” promise; and (3) that through its partnership with the Arbor Day Foundation, it will plant one million trees in forests affected by natural disasters, in support of the “Restore” promise.

The plaintiffs argue that P&G is not actually “protecting” forests and that the “Protect” promise is misleading “because P&G does not disclose that Charmin is sourced from harvests that rely on harmful logging practices.” According to the complaint, P&G sources the wood to make its Charmin toilet paper from Canada’s boreal forest—one of the last large primary forests on earth, and primary forests like this one “are responsible for storing around 30-40% of the earth’s land based carbon.” By clearing this forest, the complaint alleges that P&G is not living up to its promise of “protecting” the forest.

And the plaintiffs argue that the “Grow” and “Restore” promises are misleading “because Charmin’s suppliers are systematically converting critically important old-growth forests into environmentally devastating Frankenforests.” The complaint alleges that P&G replants the forest with “single-species conifers, evenly spaced, and with even ages” that are covered in “chemical herbicides like aerial glyphosate spray.” By doing so, P&G is “eliminat[ing] all growth other than just a handful of tree species most valuable for logging.” In support of these allegations, the complaint shows a number of aerial photos of these so-called “Frankenforests.”

The plaintiffs also take issue with P&G’s use of the FSC and the Rainforest Alliance logos. Although P&G uses the FSC logo on the front of packages and advertises that “100%” of its wood pulp is FSC-certified, the plaintiffs argue that only a small fraction of P&G’s pulp is sourced from FSC-certified forests. Moreover, the complaint alleges that P&G is not permitted to use the “FSC 100%” logo when it is relying on FSC CoC (chain of custody) and FSC CW (controlled wood) requirements around the tracking and segregation of FSC-certified and non FSC material throughout a supply chain. This requires use of a different FSC logo, the FSC “Mix” logo. The plaintiffs argue that the “Rainforest Alliance Certified” logo is also misleading because the Rainforest Alliance ceased its certification program years ago, and does not even operate in forest P&G uses.

The plaintiffs assert that P&G's campaign "clearly violates several portions" of the FTC's Green Guides, including a provision that warns companies not to make "unqualified general environmental benefit claims" that could suggest that the company or a product has far-reaching environmental benefits that the company can't support. Further, the complaint alleges that P&G has been publicly criticized by shareholders and descendants of P&G founders regarding these issues, and competitors like Kimberly-Clark have demonstrated that sustainable sourcing practices can be achieved by sourcing less raw material from natural forests, purchasing more FSC certified fiber, and incorporating recycled materials in the manufacturing process.

At this point, we only have one side of the story and it's too early to predict how this case will turn out. It is safe to predict, though, that companies will continue to be scrutinized over their environmental messaging. Companies should scrutinize those claims carefully to help ensure they are not overstating the actions and that they don't convey any claims they can't support.

The case is Lowry et al. v. Proctor & Gamble Co. and it was filed in the United States District Court for the Western District Of Washington on January 16, 2025.