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Dissertation

**Evaluating Sustainability & Green Marketing Strategy Claims: The Case
of Primark**

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Declaration

I declare that this dissertation is my own work and that all sources used have been acknowledged in accordance with UWTSD Harvard referencing requirements. This dissertation has not been submitted, in whole or in part, for any other award. I understand and accept responsibility for the accuracy, integrity and final content of this submission.

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AI Use Acknowledgement

I used the free versions of ChatGPT, Gemini and Grok for planning, structural review and language support, and Grammarly Premium for proofreading. These tools were not treated as research evidence. I checked the sources, analysis and final content and accept responsibility for the submitted work.

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Abstract

This dissertation evaluates how Primark communicates and substantiates sustainability and green marketing strategy claims and assesses potential green-claims compliance risk through public documentary evidence. A secondary qualitative single-case design was adopted. Twenty-six documents were selected purposively, comprising 15 Primark publications, five regulatory sources and six independent contextual sources. Manual thematic analysis examined 58 claim and evidence units using a framework informed by Signalling Theory, Legitimacy Theory, the Competition and Markets Authority Green Claims Code and Committee of Advertising Practice environmental-claims rules. The analysis identified six claim categories and five themes. Primark's communications showed increasing use of quantified targets, annual metrics, reporting bases and technical standards. Documentary support was often substantive, but important definitions, exclusions and lifecycle qualifications were distributed across reports, webpages, glossaries and frameworks. Thirty-four units displayed clear or aligned indicators, 18 were partly evidenced, five contained potential-risk indicators and one was not assessable. Residual risk concentrated in evidence proximity, version control, conditional recyclability wording and non-comparable measures rather than wholesale evidential absence. The dissertation contributes a claim-level account of evidence connectivity, distinguishing evidence availability from evidence usability. It recommends stronger claim ownership, cross-channel version control, proximity of material qualifications, and consistent units, baselines and assurance boundaries.

Keywords: sustainability marketing; green claims; Primark; documentary analysis; thematic analysis; compliance risk

Table of Contents

Declaration.....	2
AI Use Acknowledgement.....	3
Acknowledgements.....	4
Abstract.....	5
Table of Contents	6
List of Figures	9
List of Tables	10
List of Abbreviations	11
Glossary.....	12
Chapter 1 - Introduction	13
1.1 Background and context	13
1.2 Research problem and rationale	14
1.3 Aim, objectives and research questions.....	15
1.4 Scope and boundaries	16
1.5 Significance of the study	17
1.6 Structure of the dissertation	18
1.7 Chapter conclusion	19
Chapter 2 - Thematic Literature Review	20
2.1 Review purpose and orientation.....	20
2.2 Sustainability marketing and the problem of the environmental claim	20
2.3 Greenwashing, credibility and evidential discipline	22
2.4 Signalling Theory and the credibility of claim evidence.....	24
2.5 Legitimacy, institutional pressure and symbolic communication	25
2.6 Regulation as an analytical lens for claim risk	26
2.7 Documentary analysis and thematic interpretation	28
2.8 Critical synthesis and research gap	29

2.9 How the study addresses the gap	30
2.10 Integrated theoretical and analytical framework.....	31
2.11 Chapter conclusion	32
Chapter 3 - Research Methodology.....	33
3.1 Methodological purpose and alignment	33
3.2 Research philosophy.....	34
3.3 Research approach	35
3.4 Methodological choice.....	35
3.5 Research strategy: bounded single-case documentary study	36
3.6 Time horizon	36
3.7 Sampling and evidence-base construction	37
3.8 Data collection and management.....	37
3.9 Data analysis.....	38
3.10 Quality, ethics and limitations.....	39
3.11 Chapter summary.....	40
Chapter 4 - Findings and Results	41
4.1 Introduction	41
4.2 Evidence and analytical coverage.....	41
4.2.1 Questions applied to the documentary evidence.....	43
4.2.2 Who communicated what and how it informed the findings	44
4.3 From broad commitments to quantified claim repertoires	45
4.4 Evidence was substantive but distributed across document layers	47
4.5 Circularity and durability were operationalised but bounded.....	48
4.6 Target progress remained sensitive to scope and system conditions.....	50
4.7 Compliance-risk synthesis and findings-level RQ answers.....	51
4.8 Chapter summary.....	53
Chapter 5 - Discussion	54

5.1 Introduction	54
5.2 Integrated interpretation of the findings.....	54
5.3 Signal quality, specificity and the accessibility of evidence.....	56
5.4 Legitimacy, institutional pressure and the formalisation of claims	58
5.5 Interpreting the compliance-risk pattern.....	60
5.6 Direct answers to the research questions	62
5.6.1 RQ1: What types of claims does Primark make?	62
5.6.2 RQ2: How are claims framed, qualified, scoped and supported?	62
5.6.3 RQ3: What alignment and compliance-risk indicators emerge?.....	62
5.6.4 RQ4: What practical implications arise?	63
5.7 Theoretical contribution and managerial implications	63
5.8 Chapter summary.....	64
Chapter 6 - Conclusion and Recommendations	65
6.1 Introduction	65
6.2 Conclusions against the aim and objectives	65
6.3 Recommendations	66
6.4 Contribution and implications	66
6.6 Final conclusion	67
References	68
Appendices	77
Appendix A - Chapter 2 Literature and Framework Traceability	78
Appendix B - Chapter 4 Evidence and Coding Transparency.....	80
Appendix C - Chapter 5 Discussion and Research-Question Integration	82

List of Figures

Figure 2.1: Integrated theoretical and analytical framework for evaluating sustainability marketing claims.	30
Figure 4.1: Documentary source mix by analytical role	41
Figure 4.2: Distribution of reviewed claim units by category	45
Figure 4.3: Reported progression of clothing units using qualifying materials	46
Figure 4.4: Distribution of green-claims assessment outcomes	51

List of Tables

Table 2.1: Selected literature evidence base and analytical role.....	25
Table 3.1: Research onion decisions and methodological rationale	32
Table 4.1: Final documentary evidence and analytical role	40
Table 4.2: Research questions translated into documentary analytical questions	42
Table 4.3: Representative public statements and analytical treatment	43
Table 4.4: Reviewed claim units by claim category	44
Table 4.5: Regulatory assessment outcomes.....	50
Table 4.6: Findings-level base answers to the research questions	51
Table 5.1: Findings-to-theory interpretation	54
Appendix Table A1: Literature streams, analytical contribution and transfer boundary	77
Appendix Table B1: Representative claim-to-evidence-to-assessment trail	79
Appendix Table C1: Findings, theory, research questions and managerial control	81

List of Abbreviations

ASA	Advertising Standards Authority
CAP	Committee of Advertising Practice
CMA	Competition and Markets Authority
FAQ	Frequently Asked Questions
GHG	Greenhouse Gas
KPI	Key Performance Indicator
RQ	Research Question
SBTi	Science Based Targets initiative
WRAP	Waste and Resources Action Programme

Glossary

Claim-evidence connectivity	The extent to which a sustainability claim can be followed to relevant qualification, scope and substantiating evidence.
Commensurability	The degree to which reported measures share sufficiently consistent units, boundaries and baselines to support comparison.
Evidence proximity	How closely material evidence and qualifications are presented to the claim they support.
Green claim	A statement or representation that communicates an environmental characteristic, benefit or impact of a product, service or organisation.
Green-claims compliance risk	The potential for an environmental claim to conflict with applicable consumer-protection and advertising principles because it is unclear, broad, incomplete or insufficiently substantiated.

Chapter 1 - Introduction

1.1 Background and context

Sustainability has become an important part of how consumer-facing businesses present their products, strategies and corporate responsibilities. Environmental messages may refer to recycled or preferred materials, carbon reduction, circular design, responsible sourcing, product durability or future environmental targets. Such claims can make a company's sustainability strategy visible to customers and other stakeholders. Their meaning, however, depends on the precision of the wording, the scope of the benefit, the evidence available to support it and the information supplied alongside it. A claim that sounds comprehensive may in practice relate to one material, one stage of a product's life cycle or a future ambition rather than to the product or business as a whole.

This issue has given greater importance to the governance of environmental marketing. The Competition and Markets Authority (CMA) published the Green Claims Code to help businesses understand their consumer-law obligations when communicating environmental claims (CMA, 2021a). Its principles address truthfulness and accuracy, clarity, material omissions, meaningful comparisons, life-cycle coverage and substantiation. The Advertising Standards Authority's CAP Code provides a complementary advertising perspective. Section 11 which requires the basis of environmental claims to be clear, states that the meaning of terms must be clear to consumers, expects a high level of substantiation for absolute claims, and requires life-cycle limits to be made clear (ASA, n.d.). These standards do not make every sustainability statement a legal question, but they provide a structured basis for examining where claim wording, qualifications and disclosed support may create compliance risk.

Primark offers a relevant setting for this investigation. Its public reporting archive includes annual Sustainability and Ethics Progress Reports, reporting-basis documents and related environmental material covering commitments, reported progress and the scope of selected metrics (Primark, 2025). Primark also communicates its sustainability strategy through consumer-facing pages and product-related information. The range of material makes the case suitable in order to examine the way sustainability and green marketing strategy claims are framed across related public communications. A single-case design allows the claims to be examined in depth and under consistent selection and coding rules, without presenting a comparison as evidence of environmental superiority.

1.2 Research problem and rationale

Sustainability marketing may combine positive environmental language with different levels of qualification and substantiation. This is the primary problem of this research. The existence of a sustainability claim does not, by itself, establish that it is misleading or that an organization has breached a regulatory requirement. Greenwashing appears to be a contested and varied concept. Delmas and Burbano (2011) identify institutional, market, organizational and individual drivers that can encourage misleading environmental communication. Lyon and Montgomery (2015) on the other hand, argue that greenwash requires more precise identification instead of being treated as a single undifferentiated phenomenon. A systematic review by de Freitas Netto et al. (2020) likewise establishes a distinction between different forms and levels of greenwashing. Seele and Gatti (2017) further explains the reason why accusation-based definitions require care when legitimacy and communication are being examined. These debates demonstrate the importance of evaluating cautious claim.

Therefore, the research focuses on the relationship between what Primark says, the qualifications and evidence visible in the same documentary context as well as the potential risk indicators that arise if the claims are read against the CMA and CAP principles. Examples of relevant indicators include a broad environmental term without a clear basis. They may include a comparison that lacks identified benchmarks. They may present a benefit where visible life-cycle boundaries are absent. Lastly, they can present a future target in a way that could be confused with current performance. These are not findings of unlawful conduct, but rather analytical indicators. Primark-owned material is treated as evidence of communication and disclosure. It can not be considered as independent proof that an environmental outcome has been achieved.

The rationale for the study is not only academic but also managerial. Existing research has examined the drivers and forms of greenwashing. Additionally, it has also evaluated the relationship between environmental advertising and perceived corporate performance as well as the wider legitimacy consequences of sustainability communication. However, less priority was given to a bounded and single-company analysis which connects the wording of public marketing claims with their qualifications, scope and regulatory principles in one documentary framework. This study utilizes a feasible secondary qualitative analysis to address that gap. It does not attempt to measure consumer attitudes, test actual environmental performance, or determine a legal breach. Its purpose is to evaluate the visible claim structure and the level of documentary support that accompanies it.

1.3 Aim, objectives and research questions

The aim of this dissertation is:

To evaluate how Primark communicates and substantiates sustainability and green marketing strategy claims, and to assess potential green-claims compliance risk through a secondary qualitative thematic analysis of public documentary evidence.

The objectives and research questions are deliberately matched so that each question can be answered using publicly available secondary documents.

Objective	Matching research question
1. To identify and categorise sustainability and green marketing strategy claims made by Primark in selected public communications.	RQ1. What types of sustainability and green marketing strategy claims does Primark make in selected public communications?
2. To examine how Primark's claims are framed, qualified, scoped, and supported by documentary evidence.	RQ2. How are Primark's claims framed, qualified, scoped, and supported by documentary evidence?
3. To assess Primark's claims against a green-claims compliance-risk framework informed by the CMA Green Claims Code and CAP environmental-claims rules.	RQ3. What potential alignment and compliance-risk indicators emerge when Primark's claims are assessed against the CMA Green Claims Code and CAP environmental-claims rules?
4. To develop practical implications for clearer and better-evidenced sustainability marketing communication.	RQ4. What practical implications arise for the design and substantiation of Primark's sustainability marketing communications?

1.4 Scope and boundaries

The unit of analysis is the sustainability or environmental claim and its accompanying qualification, evidence signal, scope or limitation in selected public communications. The document set consists of 26 recent, publicly accessible sources. It includes 15 Primark documents, five regulatory documents and six independent contextual documents. Apart from that, the Primark material comprises a plethora of materials, such as sustainability reports, reporting-basis documents, dedicated sustainability webpages, product or packaging information, and climate or circularity material. The analytical lens is defined by CMA and ASA sources. Selected independent sources provided contextual challenge or corroboration. The source matrix records multiple elements, such as provenance, publication or access information, relevant page or section, analytical role and the limits of each source.

The analysis is qualitative, interpretive and manual. Thematic coding identifies patterns in a range of factors, namely, claim type, framing, qualification, evidence, scope, timing and potential compliance risk. Company communications are separated from independent evidence. On the other hand, regulatory guidance is used as a benchmark instead of as proof of a breach. The project did not recruit participants, collect personal data, conduct interviews or surveys, access confidential information for primary testing. It did not verify Primark's operational environmental performance as well.

These boundaries develop important limitations. Public documents may change, be removed or present information selectively. A documentary study cannot establish the full truth of an environmental outcome due to the unavailability of underlying operational records. The single-case design also limits statistical generalization to other retailers. Nevertheless, the design is appropriate for the research questions as they concern the form, support and apparent regulatory risk of public claims.

1.5 Significance of the study

The study has a practical significance for sustainability marketing management. It can demonstrate that the clarity of a claim does not depend only on positive environmental language. Several factors, such as basis, material scope, comparison, life-cycle boundary, timeframe and substantiation also shape how a claim may be understood. This offers a practical framework for reviewing communications before publication. The same framework can be used in order to separate current performance from future commitment. The intended contribution is to identify communication features which require stronger explanation or evidence.

The study also contributes methodologically by demonstrating the manner in which public documentary analysis can connect marketing communication with an explicit regulatory framework. Bowen (2009) argues that documents can provide useful qualitative data only if their provenance, context and limitations are addressed. Braun and Clarke (2006) establish thematic analysis as a flexible method for identifying meaning derived from pattern by using a structured coding process. An auditable bridge between the source statement, the regulatory criterion and the researcher's interpretation can be built by applying these above mentioned principles to sustainability claims. The resulting framework can support later research on other companies or sectors.

1.6 Structure of the dissertation

The dissertation is organized into six chapters. Chapter 1 introduces the sustainability-claims problem and establishes the research rationale. In addition to that, it also determines several factors, such as aim, objectives, research questions, scope and contribution. Apart from that, Chapter 2 critically reviews literature on sustainability marketing, greenwashing, claim substantiation, environmental regulation and documentary thematic analysis. It also develops the analytical framework. Meanwhile, Chapter 3 explains the research philosophy, qualitative single-case design, public-document sampling, manual thematic coding, ethical safeguards and limitations. On the other hand, Chapter 4 presents the findings from the coded Primark evidence by theme and objective. Chapter 5 discusses those findings in relation to the literature and the CMA and CAP principles. However, maintaining the distinction between compliance-risk indicators and legal findings. Lastly, Chapter 6 concludes the dissertation and answers the research questions. Additionally, it also identifies practical implications and future research directions.

1.7 Chapter conclusion

This chapter has established the need to examine sustainability marketing claims on the basis of their wording, qualifications, scope and supporting evidence. It has positioned Primark as a feasible single case for secondary qualitative documentary analysis and has defined compliance risk as an evaluative category rather than an accusation. The aligned objectives and research questions provide a clear route into the literature review, which develops the concepts and analytical framework applied in the subsequent chapters.

Chapter 2 - Thematic Literature Review

2.1 Review purpose and orientation

This chapter critically reviews the literature needed to evaluate sustainability and green marketing strategy claims through public documentary evidence. It is organised thematically, moving from environmental marketing claims to greenwashing and credibility, Signalling Theory, Legitimacy Theory, regulation and qualitative documentary analysis. The purpose is to establish a defensible analytical framework for the four research questions set out in Chapter 1.

The review is theory-led rather than systematic. It focuses on peer-reviewed research, methodological texts and authoritative UK regulatory materials which contribute to shaping the study's concepts or coding decisions. Older sources can establish foundations. Recent work on the other hand, tests their relevance. The focal organization is intentionally absent. This chapter develops concepts for later application to the documents. It does not introduce findings before coding.

The term "*claim*" is used from a practical documentary sense. It includes an environmental statement, an implied benefit, comparison, certification reference, quantified result or future commitment communicated as part of a sustainability strategy. A document may report that a material was used, imply that it is preferable and present that implication as a wider benefit. The analysis must retain these layers and distinguish current performance from ambition, because a target is not evidence that it has already been achieved.

2.2 Sustainability marketing and the problem of the environmental claim

Green marketing has no single settled meaning. Polonsky and Rosenberger (2001) treat it as a strategic approach that incorporates environmental considerations across the marketing mix, while Belz and Peattie (2012) position sustainability marketing as a broader attempt to align value creation, consumption and ecological limits. Therefore, A sustainability claim may concern a product attribute, process, supply-chain activity, corporate commitment or future state. These are not interchangeable forms of evidence.

The critical literature warns against equating environmental language with sustainable practice. Peattie and Crane (2005) identify forms of green marketing that create a green image without transforming the underlying offer. Kilbourne (1998) argues that the discipline is constrained by a dominant social paradigm that frames environmental problems as matters of technological adjustment or consumer choice rather than production and consumption systems. Bansal and Roth (2000) show that ecological responsiveness can reflect competitiveness, legitimation and ecological responsibility, while Du, Bhattacharya and Sen (2010) demonstrate that communication mediates stakeholder interpretation without proving environmental effectiveness.

Environmental advertising research offers a basis for claim classification. Carlson, Grove and Kangun (1993) connect claim types to the likelihood of being judged misleading; Banerjee, Gulas and Iyer (1995) distinguish advertisements by sponsor, focus and depth; and Leonidou *et al.* (2011) show that international firms' green advertising remains uneven in specificity and strategic integration. With the contribution of these classifications, the present study's attention can be redirected to claim type and communicative depth. However, they might not be sufficient in order to evaluate the evidence chain. A claim may be specific with weak substantiation. It can be broad and still properly qualified by methodology. As a result, the relevant unit is the claim with its context, qualifier, evidence signal, comparison, timeframe and boundary.

Sustainability marketing is not only an advertising problem. Claims can appear in a range of materials, such as product descriptions, websites, reports, packaging, policies, targets and FAQs. These genres can be read together by the public. A product statement may gain authority from a connected report. On the other hand, a corporate ambition may shape interpretation of a product message. As a result, The analysis creates a distinction between several factors, such as consumer-facing claims, methodological explanations, performance disclosures and independent contextual evidence. It does not apply universal vocabulary of acceptable environmental words. Instead, It asks whether a narrow claim creates a wider impression if its limitation is not visible.

2.3 Greenwashing, credibility and evidential discipline

Although the concept of Greenwashing is useful, it is contested. Delmas and Burbano (2011) identify market, institutional, organizational and individual drivers. Lyon and Montgomery (2015) on the other hand, show that the term covers selective disclosure, symbolic action, vague claims and communication that exceeds available evidence. de Freitas Netto et al. (2020) creates a distinction between firm-level and product-level, claim-level and execution-level forms. In a similar manner, Seele and Gatti (2017) accordingly separate accusation-based definitions from the wider study of green communication and legitimacy strategies. The literature supports a differentiated vocabulary instead of a binary green or not-green judgement.

This distinction is important for secondary documentary research. A researcher can identify a broad, unclear or weakly supported claim without proving intentional deception. The present study therefore uses *green-claims compliance risk* to mean a feature warranting scrutiny against an external principle, not a conclusion that greenwashing or a legal breach has occurred.

This distinction can prove to be significant for secondary documentary research. A researcher can identify a broad, unclear or weakly supported claim without proving intentional deception. As a result, the present study uses green-claims compliance risk to mean a feature warranting scrutiny against an external principle. It does not indicate that greenwashing or a legal breach has occurred.

Research on credibility explains the importance of evidence. Walker and Wan (2012) distinguish substantive actions from symbolic actions. Lyon and Maxwell (2011) model disclosure under audit threat. Apart from that, Parguel, Benoît-Moreau and Larceneux (2011) examine sustainability ratings as a possible deterrent. Parguel, Benoît-Moreau and Russell (2015) show how environmental cues can shape perceptions without detailed performance information. Nyilasy, Gangadharbatla and Paladino (2014), Chen and Chang (2013), de Jong, Huluba and Beldad (2020) and Torelli, Balluchi and Lazzini (2020) further demonstrate that different forms of greenwashing can produce different consumer or stakeholder reactions. Lastly, Berrone, Fosfuri and Gelabert (2017) show that scrutiny and deteriorating performance can also reverse the legitimacy benefits of environmental action.

These studies provide context rather than consumer evidence for this dissertation. They expose a limitation. Experiments and surveys tend to operationalize greenwashing through perceptions. However, organizational studies often examine broad disclosure or outcomes. Fewer studies preserve the claim-level relationship between wording, qualification, scope, evidence and regulatory principle. A bounded thematic analysis can address that gap without measuring attitudes or actual environmental impact.

The distinction between claim and evidence is especially important due to the fact that corporate sustainability communication often contains both. A target, policy or reported metric may substantiate only one proposition. For example, evidence that a programme exists does not by itself establish the environmental benefit implied by a broad adjective. Evidence of progress against a baseline does not automatically support a comparison with another product. On the other hand, a certification may verify a defined attribute without covering the whole lifecycle. As a consequence, The greenwashing literature supports an evidence-sensitive reading in which the researcher asks what proposition each source actually supports.

The literature also warns against equating omission with deception. A short communication may direct readers to fuller material. However, selective disclosure can still create a misleading impression. Materiality depends on claim, audience and context. A differentiated account provided by Lyon and Montgomery's (2015) keeps the analysis open to omission, vagueness, selective emphasis and executional cues. Public claims can support accountability by making activity visible. Although it can also narrow attention to selected achievements. Therefore, Potential risk is treated as a property of the claim-evidence relationship. It does not prove that communication has no value.

2.4 Signalling Theory and the credibility of claim evidence

Signalling Theory explains communication under information asymmetry. Spence (1973) shows how observable signals can communicate unobservable qualities; Connelly *et al.* (2011) distinguish senders, receivers, signals and signal quality; and Kirmani and Rao (2000) apply the logic to observable marketing variables. Environmental performance is often difficult for consumers to inspect directly, so wording, metrics, certification, methodology and reporting links may operate as signals.

The theory is especially useful for specificity. Atkinson and Rosenthal (2014) find that argument specificity can increase trust in green advertising. A claim identifying a material, boundary, method, baseline or timeframe provides more information for evaluation than an unqualified statement of environmental preference. Specificity is not proof. It is a precise signal which may still be incomplete or selectively framed. Therefore, the theory generates coding questions about different factors of the claim, such as basis, scope, conditions and evidence trail. For RQ2, It is the main lens. However, it is complemented by Legitimacy Theory as signals are interpreted within social and regulatory expectations.

The cost and quality of a signal also require careful interpretation. A slogan or colour cue is relatively easy to reproduce. For this reason, they may carry less information than a transparent methodology, a measurable baseline or an independently governed certification. Although it does not make an expensive signal automatically reliable, it gives the researcher a basis for distinguishing symbolic cues from evidence-bearing features. There can be internal inconsistencies in a set of signals. For instance, a specific metric can sit beside a general claim that extends beyond the metric's scope. The framework consequently codes signal bundles instead of treating one metric as decisive.

Signalling theory is sensitive with regard to the receiver. Different audiences may have different knowledge, capacity and reasons for trusting a source. A technical reporting basis may be meaningful to an expert and still insufficiently clear in a short consumer-facing message. Conversely, a concise claim may be understandable only if a linked explanation provides the missing basis. The documentary analysis cannot measure these audience differences. However, it can record whether the communication provides a route from the headline claim to the supporting explanation. This is a more modest and achievable use of the theory compared to predicting trust or purchase behaviour.

2.5 Legitimacy, institutional pressure and symbolic communication

Legitimacy Theory explains why organizations communicate environmental responsibility to audiences whose approval is important for continued operation. Suchman (1995) creates a distinction between pragmatic, moral and cognitive legitimacy. These three forms of legitimacy can be addressed by Environmental marketing through promising value, presenting appropriate conduct and making sustainability language comprehensible.

The theory also separates substantive from symbolic legitimation. Ashforth and Gibbs (1990) show that symbolic management can become damaging. Bansal and Clelland (2004) connect environmental legitimacy with stakeholder expectations. O'Donovan (2002) connects disclosure choices to attempts to gain, maintain and repair legitimacy. Institutional theory adds that formal structures can become myths and ceremonies (Meyer and Rowan, 1977). On the other hand, coercive, mimetic and normative pressures produce similarity across organizations (DiMaggio and Powell, 1983). Cho, Laine, Roberts and Rodrigue (2015) and Hahn and Lülfs (2014) show how conflicting demands along with symbolic strategies can create gaps between sustainability talk, decisions and action.

Legitimacy research commonly examines reporting, media or outcomes instead of claim wording. It can invite unsupported claims about private motives. Hence, It is therefore used here as a sensitising device. The analysis examines the process in which claims construct appropriateness and responsibility without inferring intent. This complements Signalling Theory by placing evidence signals within institutional expectations.

Legitimacy is dynamic. Organisations may seek to gain it as expectations rise, maintain it through routine reporting or repair it after criticism (Suchman, 1995; O'Donovan, 2002). Context can be derived from several factors, such as dates, targets, reporting cycles and standards. Nonetheless, they do not reveal private motives. Institutional theory also explains the reason why reporting standards and regulatory language become normalised. Convergence can prove to be useful in order to improve comparability. However, formal adoption does not indicate substantive change. The study examines what aspects are supported by each framework.

2.6 Regulation as an analytical lens for claim risk

Regulatory guidance bridges credibility theory and claim wording. The CMA Green Claims Code requires claims to be truthful and [accurate](#). It also requires them to be clear and complete in material [information](#). In addition to that, claims must be fairly comparative, lifecycle-aware and substantiated (CMA, 2021a). CAP Section 11 complements this for non-broadcast marketing as it requires a clear basis, understandable terms, strong substantiation and visible lifecycle limits (ASA, n.d.).

These materials are not a substitute for legal analysis. The dissertation codes *apparent alignment* and *potential risk indicators*. The lens asks whether the public material makes a claim's basis, scope, comparison, lifecycle and substantiation visible enough for cautious evaluation.

Table 2.1: Selected literature evidence base and analytical role.

Evidence stream	Selected literature	Main contribution	Use and boundary in this study
Sustainability marketing	Peattie and Crane (2005); Kilbourne (1998); Polonsky and Rosenberger (2001); Belz and Peattie (2012)	Defines green and sustainability marketing while questioning narrow promotional approaches.	Establishes the difference between communicating sustainability and demonstrating sustainable performance.
Environmental advertising	Carlson, Grove and Kangun (1993); Banerjee, Gulas and Iyer (1995); Leonidou et al. (2011)	Classifies claim types, environmental focus and communicative depth.	Informs the claim taxonomy; it does not provide a legal test or proof of environmental effect.

Evidence stream	Selected literature	Main contribution	Use and boundary in this study
Greenwashing and credibility	Delmas and Burbano (2011); Lyon and Montgomery (2015); de Freitas Netto et al. (2020); Seele and Gatti (2017)	Shows that greenwashing is heterogeneous and accusation-based.	Supports cautious compliance-risk coding rather than an allegation of intent.
Signals and legitimacy	Spence (1973); Connelly et al. (2011); Kirmani and Rao (2000); Suchman (1995); Cho et al. (2015)	Explains evidence signals, institutional expectations and symbolic or substantive legitimation.	Supplies the main theoretical framework; motives and causal effects remain outside the data.
Regulation and method	CMA (2021a); ASA (n.d.); Bowen (2009); Braun and Clarke (2006, 2019, 2021a); Nowell et al. (2017)	Converts principles into auditable documentary questions and supports transparent thematic analysis.	Structures the later codebook; it is not a systematic review or a regulator's decision.

Source: compiled from the literature reviewed in this chapter.

The principles translate into documentary questions. Clarity and accuracy direct attention to wording and definitions. Material information direct attention to exclusions and qualifications. Comparisons focus on comparator, baseline and time period. Lifecycle analysis emphasizes covered stage or attribute. Lastly, substantiation to evidence type, methodology, certification, metric or source. This links RQ3 to the claim and evidence categories identified through RQ1 and RQ2.

This operationalization also clarifies the role of qualifications. A qualification does not automatically cure an otherwise over-broad impression. However, it can materially change the meaning of a claim when it is prominent, specific and understandable. As a result, the codebook records the position and wording of qualifications. It records whether an absolute term is explained, and if a future target is labelled as future. In addition to that, it registers whether a comparison identifies its basis, and if lifecycle limits are visible at the point where the benefit is claimed. These should not be considered as legal tests, but rather communication observations.

The regulatory lens establishes structured accountability. It requires the analyst to explain why a claim warrants scrutiny instead of relying on an impression that it feels green. Guidance cannot replace evidence about the product or determine every contextual question, although it creates a transparent bridge between theory and manual coding.

2.7 Documentary analysis and thematic interpretation

Documents are appropriate when the question concerns what an organisation has publicly communicated and how the communication is structured. Bowen (2009) requires attention to provenance, context, authenticity and limitations: a document is a situated record, not a transparent window onto organisational reality.

Braun and Clarke (2006) describe thematic analysis as familiarisation, coding, theme development, review, definition and reporting. Their later work stresses reflexivity and rejects a single quality template (Braun and Clarke, 2019; Braun and Clarke, 2021a). Nowell *et al.* (2017) emphasise an audit trail and coherent links between data and themes, while Gioia, Corley and Hamilton (2013) show how qualitative rigour depends on making abstraction visible. The methodology utilizes a manual thematic analysis, which is informed by theory. It also uses an abductive coding method. Initial quotes are sensitized by several factors, such as claim classifications, two main theories and CMA/CAP principles. It allows for new document patterns to emerge. Yin (2018) supports a bounded single-case design. Saunders, Lewis and Thornhill (2019) stress alignment between questions, evidence and analysis.

Public documents may be selective, revised or unavailable, and absence of evidence in one document is not proof that none exists elsewhere. These limits are managed through eligibility rules, a source matrix, a claim ledger, preserved extracts, source-position labels and reflexive notes. The framework aims to make interpretation inspectable.

Document genre is part of the analytical context. A policy may define a commitment, a report may quantify progress, a product page may make a direct consumer proposition, and a regulatory document may define an expectation rather than describe corporate performance. Treating these as equivalent would distort the evidence. Thus, The source matrix preserves several factors, such as authorship, purpose, date, location, claim-bearing passage and evidential role. Triangulation indicates comparing roles. An independent source can challenge or contextualise a corporate statement. However, existence does not automatically establish the opposite conclusion.

The manual approach is appropriate as the questions concern meaning, qualification and relationships between text segments. Frequency counts cannot alone show whether a qualification limits a claim and if a comparison is meaningful. It also indicates if a lifecycle boundary is material. Manual thematic analysis retains these relationships and an audit trail makes decisions reviewable.

2.8 Critical synthesis and research gap

The literature supports four propositions. Sustainability claims place itself between strategy and communication. Greenwashing is heterogeneous. Signalling Theory explains why evidence and specificity is pertinent. Lastly, Legitimacy and Institutional Theory explain how environmental communication is shaped by expectations and pressure. Regulation supplies observable principles that discipline interpretation, although it cannot be converted into a finding of non-compliance without the relevant process.

Three connected gaps follow. First is conceptual integration. Sustainability marketing, greenwashing, Signalling and legitimacy are often studied in parallel as opposed to at the level of one claim. Its evidence and the regulatory principle are used to evaluate it. Secondly, consumer experiments and surveys address perceived credibility. On the other hand, reporting studies address organisational disclosure. A few studies preserve the claim-level relationship between wording, qualification, scope, evidence and regulatory expectations. Thirdly, regulatory principles are often background norms instead of explicit coding criteria. There is scope for a transparent manual approach that identifies potential risk indicators without legal or causal claims.

This is not a claim that environmental communication or documentary analysis is unstudied, but rather a bounded gap. The contribution is to integrate established theory and regulatory principles into a feasible secondary framework for a single-case MBA dissertation.

Therefore, the gap is one of analytical connection as opposed to simple absence. Although, environmental advertising research supplies categories, it often predates digital, report-linked communication. Greenwashing research supplies typologies. However, it often measures perceptions or aggregate outcomes. Legitimacy research explains social approval, although it may operate at organizational level. Lastly, regulatory guidance can play a role in providing principles. However, it is not always operationalized qualitative coding. The study can ask a narrower question with greater position by bringing these strands together. These questions are as follows: what is being claimed, what is offered as support, what is omitted and what regulatory concern could reasonably arise from that relationship.

This contribution remains modest. It does not establish a general theory of green claims or calculate a greenwashing prevalence rate. It provides a traceable analytical model that supports the case-specific findings and practical recommendations. That level of contribution is proportionate to a secondary qualitative design. It protects the study from claims which its evidence cannot carry.

2.9 How the study addresses the gap

The study addresses the conceptual gap by combining Signalling Theory and Legitimacy Theory. Signalling Theory focuses on what a claim makes observable. For example, specificity, metrics, methodology, certification, qualification, scope and timeframe. Legitimacy Theory focuses on appropriateness, responsibility and alignment with expectations. On the other hand, Institutional theory contextualises recurring formats and pressures. Lastly, CMA and CAP principles benchmark clarity, material information, comparisons, lifecycle and substantiation.

It addresses the evidence-unit gap by treating each claim with its documentary context as the primary unit. Objective 1 or RQ1 maps claim types. Objective 2 or RQ2 examines framing, qualification, scope and evidence. Subsequently, Objective 3 or RQ3 assesses apparent alignment and risk indicators. At the end, Objective 4 or RQ4 develops practical implications. Assessment processes, such as Transparent sampling, manual coding and separation of source statement, theoretical interpretation and regulatory benchmark keep the analysis within secondary evidence. The study does not measure attitudes, verify performance through primary testing. Aside from that, it also does not infer private motives or determine a legal breach.

The framework establishes a route from theory to recommendation. Broad wording may require clearer definitions. Evidence opacity may require methodology, baselines or supporting links. On the other hand, temporal ambiguity may require separation of current results from targets. Lastly, lifecycle risk may require visible boundaries. Recommendations are derived from documented patterns in lieu of generic advice.

2.10 Integrated theoretical and analytical framework

Figure 2.1 integrates the literature into a sensitising framework. A public claim is considered as both a potential signal and legitimacy work. Its analytical meaning is developed through several elements, such as specificity, evidence, qualification, scope and timeframe. Institutional expectations can influence communication. On the other hand, CMA and CAP principles benchmark alignment and potential risk. The themes are domains for manual interpretation

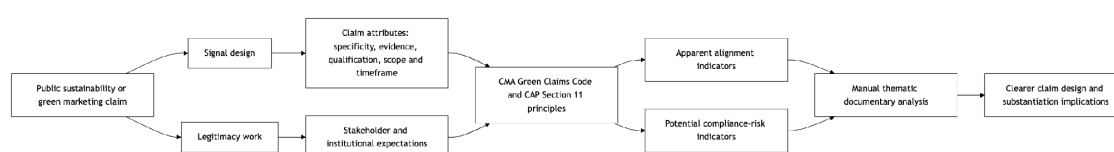


Figure 2.1: Integrated theoretical and analytical framework for evaluating sustainability marketing claims.

Source: developed from Spence (1973), Kirmani and Rao (2000), Connelly et al. (2011), Suchman (1995), Ashforth and Gibbs (1990), Delmas and Burbano (2011), CMA (2021a), ASA (n.d.) and Braun and Clarke (2006, 2019, 2021a).

The framework makes three boundaries explicit. A signal is an observable feature. it is not proof of an environmental result. Legitimacy work concerns the relationship between message and expectations. Compliance risk is an analytical assessment instead of a regulator's determination. These boundaries permit practical judgement about communication quality without overclaiming.

The framework is abductive in use. Theory supplies expectations about signals, legitimacy and regulatory clarity. However, documents may reveal combinations that theory does not predict. Patterns are interpreted through the theories, checked against regulatory criteria and retained only where the source trail supports them. Hence, the framework is sensitising as opposed to a fixed hypothesis model.

2.11 Chapter conclusion

This chapter has shown that sustainability claims require analysis of wording, evidence, scope and context. Green marketing and greenwashing research expose substantive and credibility tensions. Signalling Theory explains evidence. Legitimacy and Institutional Theory explain pressure. Apart from that, CMA/CAP principles discipline evaluation. The review identifies a bounded claim-level integration gap which is addressed through manual secondary thematic analysis without consumer measurement, primary performance testing or legal conclusions. Chapter 3 sets out the resulting sampling, coding, ethics and quality procedures.

Chapter 3 - Research Methodology

3.1 Methodological purpose and alignment

This chapter explains how the study evaluated sustainability and green marketing strategy claims in the Primark case. It addresses what claims are made and how they are framed and supported. Additionally, it analyzes what potential compliance-risk indicators arise against UK guidance, and what communication implications follow. The design examines public documentary communication instead of consumer attitudes, organizational intentions or environmental performance which cannot be observed from the selected evidence. Each conclusion is traceable to a document, claim extract, code and theme.

The study follows Saunders, Lewis and Thornhill's (2019) research onion as a sequence of linked decisions. Table 3.1 summarises how the philosophy informs the approach, method choice, strategy, sampling, time horizon and analysis.

Table 3.1: Research onion decisions and methodological rationale

Onion layer	Adopted decision	Fit with the research questions	Alternative not selected
Philosophy	Critical-realist-informed qualitative position	Distinguishes public claims from the performance they represent	Positivism would overstate measurement; interpretivism alone could weaken external assessment
Approach	Abductive and theory-informed	Moves between signalling, legitimacy, regulatory concepts and documentary patterns	Pure deduction risks forcing evidence into prior codes; pure induction underuses the framework
Method choice	Mono-method qualitative	Captures wording, qualification, scope, evidence and context	Quantitative counting misses meaning; mixed methods require data outside the scope
Strategy	Bounded single-case documentary study	Provides depth and consistency within one organisational case	A multi-case design dilutes the Primark focus and expands sampling
Time horizon	Cross-sectional, bounded retrospective window	Captures a defined claim landscape with recent development in context	Full longitudinal analysis requires consistent historic evidence and measures

Onion layer	Adopted decision	Fit with the research questions	Alternative not selected
Sampling	Purposive, criterion-based documentary sampling	Selects information-rich documents relevant to claims and compliance	Probability sampling cannot usefully sample an unstable, unenumerated web population
Analysis	Manual thematic analysis	Makes claim, evidence, qualification and risk patterns auditable	Automated analysis strips away context and regulatory meaning

3.2 Research philosophy

The study adopts a critical-realist-informed position. Critical realism is useful here as it creates a distinction between an observable layer of representations and a deeper reality which may not be fully disclosed by those representations. As a result, a sustainability claim is treated as a real communication event that can be evaluated. However, it does not prove that the claimed environmental condition exists. This distinction prevents the study from confusing the presence of an assertion with verified environmental performance. It also permits the analysis to consider how language, institutional expectations and regulatory standards shape what becomes publicly knowable, and preserves the possibility that material practices exist beyond the documents (Saunders, Lewis and Thornhill, 2019; Easton, 2010).

This position is preferable to positivism due to the fact that the study lacks controlled product life-cycle measurements for causal or universal testing. It is also more suitable than an exclusively interpretivist position. Interpretive sensitivity is necessary for wording and meaning, although an external compliance-risk lens is needed to identify missing qualifications, unclear scope or unsupported comparisons. The position supports cautious assessment without a legal finding or audit of Primark's actual performance.

3.3 Research approach

The research utilizes an abductive approach. Abduction involves iterative movement between existing theoretical ideas and observations in order to develop the most plausible explanation of a pattern (Dubois and Gadde, 2002). The literature review supplies sensitising concepts from signalling theory and legitimacy theory. On the other hand, the Competition and Markets Authority's (CMA, 2021a) Green Claims Code and the Advertising Standards Authority's (ASA, n.d.) CAP environmental-claims rules provide a regulatory frame. These concepts guide initial attention to several factors, such as evidence signals, institutional expectations, clarity, scope, substantiation and omitted material information. The documentary analysis remains open to additional patterns which are not adequately represented by the initial framework.

Abduction was preferable compared to a purely deductive design. This is because a fixed checklist could overlook distinctive claim forms. A wholly inductive design would prove to be less connected to the established theoretical and regulatory questions. The study utilized deductive sensitising codes followed by inductive refinement. It checked interpretations against the original wording and context. It did not infer private motives or organisational causality.

3.4 Methodological choice

The study follows a mono-method qualitative design. Qualitative analysis is appropriate as the research questions concern the content, framing, qualification, evidence and meaning of sustainability communications. The unit of analysis is a claim combined with its immediate context and any connected substantiation or limitation. As a result, the method can preserve distinctions between an absolute statement, a qualified target, a product-specific explanation and a broad corporate aspiration.

Quantitative content analysis could count words, claim types or disclosure frequencies. However, it would provide limited insight into how scope, imagery, caveats and evidence interact. A mixed-method design would require an additional dataset. For example, consumer responses or verified performance indicators. It should be outside the approved scope. Interviews and surveys would investigate stakeholder perceptions in lieu of the public claims. It will require a different ethics and sampling arrangement.

3.5 Research strategy: bounded single-case documentary study

The strategy can be defined as a bounded single-case study of Primark using public documents. Case study research is appropriate when a contemporary phenomenon is examined in its real-world context and the boundary between phenomenon and context is not fully separable (Yin, 2018). The case is bounded by the organisation, the sustainability and green marketing claim focus. It is also restricted by the public-document evidence base and the defined publication window. Documentary analysis is suitable as documents can provide stable, retrievable records of organisational communication, regulatory expectations and relevant external context (Bowen, 2009).

A single case allows detailed comparison between claim genres and evidence arrangements within the sphere of one organisation. Recurring patterns can be evaluated across reports, webpages, product or packaging communications and campaign material. It does not need to treat different organisations as equivalent. Multi-case comparison would expand sampling and introduce differences which the aim does not require. Primark's documents are primary claim material. It is not independent proof. Regulatory documents establish criteria and independent sources provide provenance or context.

3.6 Time horizon

The time horizon is cross-sectional with a limited retrospective window from 1 January 2021 to 12 August 2026. It captures a defined claim landscape. However, it allows recent changes in wording, targets and disclosure practice to be considered. It is not a longitudinal evaluation of environmental performance. Publication date, access date and any apparent supersession were recorded in case of every included document.

3.7 Sampling and evidence-base construction

Purposive and criterion-based sampling was utilized to select documents. This is appropriate when records are chosen for information-rich relevance as opposed to statistical representativeness (Palinkas et al., 2015). The target was approximately 20-30 documents. Out of these, 12-16 Primark were claim-bearing documents, 4-6 were regulatory documents and 4-8 were independent contextual documents. The achieved sample consisted of 26 documents. This document set included 15 Primark, five regulatory and six independent or contextual sources. Academic literature informed the framework, although it was not coded as Primark claim data.

An eligible Primark document needed to be public, dated or reliably attributable. It should be within the window and contain a sustainability claim or substantive explanation of its scope, evidence or limitation. The sample varied across a plethora of materials, such as reports, reporting-basis material, sustainability webpages, product or packaging pages, climate or circularity pages, substantive FAQs and campaign communications. Regulatory documents were limited to CMA, CAP and directly relevant ASA material. Independent documents were selected on the basis of credibility, dateability and connection to a selected claim.

Duplicates, undated and impossible to contextualize documents were excluded. Data which were lacking a sustainability claim, login-protected and confidential were also excluded from the analysis. The sample was fixed after each document had been logged and the main claim families and genres were represented. The stopping decision were recorded. They were not justified by statistical saturation.

3.8 Data collection and management

The search began with Primark's official corporate and sustainability communications (Primark, 2025), followed by official CMA and ASA sources and a limited search for independent context. For each document, the source matrix recorded a range of information, namely, title, publisher, dates, URL, type, source role, relevant section, claim extract and limitation. A claim ledger linked each extract to its document, initial code, regulatory principle and interpretation. As a result, it prevented a corporate assertion from becoming an unmarked finding.

A password-protected personal laptop with device encryption was used to store public source documents, extracts, matrices, coding records and drafts. They may be uploaded to cloud storage when needed or provided to the supervisor or authorised assessors. No university computer is used for storage, and the materials contain no participant data or confidential organisational material.

3.9 Data analysis

The data were analysed manually through reflexive thematic analysis. Braun and Clarke's (2006) six phases structured the work. These phases are as follows: familiarisation, initial coding, candidate themes, theme review, definition and naming, and reporting. Later guidance stresses that thematic analysis requires coherent decisions about the question, coding and theme development (Braun and Clarke, 2019; Braun and Clarke, 2021b). A manual coding matrix was feasible for the limited dataset. It also provided a visible audit trail.

Coding occurred in two stages which are connected. Deductive codes covered a range of elements. These are as follows: type, framing, evidence and qualification, scope and lifecycle, comparison, clarity, material omissions, substantiation, signalling and legitimacy. Inductive codes were added where recurring features did not fit. The coding unit included the claim and enough surrounding text or visual description to preserve meaning. A claim could receive multiple codes. However, the document's statement, regulatory principle and interpretation remained distinct.

RQ1 was answered by grouping claims into multiple factors, such as product benefit, packaging, circularity, climate, environmentally relevant sourcing, and target or future-oriented claims. RQ2 examined a plethora of factors. These factors are as follows: specificity, temporal orientation, imagery, qualifiers, metrics, baselines, methodology, certification, scope and lifecycle information. RQ3 assessed CMA and CAP indicators including clarity, accuracy, evidence, comparisons and material information. RQ4 derived implications from recurring coded patterns. Automated keywords, sentiment or machine could miss qualification, page context and the difference between a claim and a caveat. For this reason, they were excluded.

In case of each regulatory assessment, the matrix recorded the relevant claim and the applicable principle. It also recorded the documentary evidence supporting or qualifying it, and a cautious evaluation of alignment or potential risk. The categories were descriptive instead of numerical. An indicator could either be clear, partly evidenced, unclear or not evaluable from the public record. "Not assessable" was used where the document did not provide enough information. This rule kept the analysis proportionate to the available evidence.

3.10 Quality, ethics and limitations

Trustworthiness was addressed through credibility, dependability, confirmability and transferability (Lincoln and Guba, 1985; Shenton, 2004). Credibility utilized a range of elements, such as source roles, contextual checking, negative or contradictory examples. It also analyzed separation of corporate, independent and regulatory material. Dependability used a dated search log, fixed criteria, versioned codebook and source-to-theme audit trail. Confirmability used the claim ledger, reflexive notes along with separation of fact, principle and interpretation. Transferability was supported by explaining the case boundary, genres and analytical decisions (Nowell et al., 2017).

As this is a single-researcher analysis, formal inter-coder reliability is not claimed. Instead, consistency was strengthened through multiple initiatives. For example, codebook revision, recording of early documents after the framework stabilised, negative-case review and supervisor discussion. Ethical risk proves to be low as the study uses public documents and no participants. Nonetheless, Corporate reputational risk requires accurate quotation, traceability, non-accusatory language and no unsupported assertion of legal breach or greenwashing.

The principal limitations are selective corporate disclosure and changing webpages. The limitations also include incomplete access to internal substantiation and inability to test product life-cycle performance. Independent sources may be uneven across claims. Findings concern public communication and potential compliance risk.

3.11 Chapter summary

The study can be defined as a critical-realist-informed, abductive, mono-method qualitative single-case documentary study. Purposive criterion sampling created a bounded public dataset. On the other hand, manual thematic analysis connected claim wording to several factors, such as evidence, qualification, theory and regulatory-risk indicators. The audit trail, source-role distinctions and explicit limitations provide a feasible foundation for the chapters which contains results and discussions.

Chapter 4 - Findings and Results

4.1 Introduction

This chapter presents the findings from the manual thematic analysis of Primark's public sustainability and green marketing communications. It addresses the four research questions by examining claim types, framing, qualification, documentary support and potential alignment or risk indicators under the CMA Green Claims Code and CAP environmental-claims rules. No questions were put to interviewees or survey respondents because the study used secondary documents and recruited no participants. Instead, the research questions were converted into analytical questions applied systematically to public statements. In this chapter, therefore, "who communicated" identifies the organisation or document publisher, while "what was said" refers to a recorded public claim or qualification rather than an answer elicited by the researcher. The findings concern the communication visible in the selected documents. They do not determine legal compliance, infer organisational motives, measure consumer response or verify Primark's total environmental performance.

4.2 Evidence and analytical coverage

The final sample contained 26 public documents published or current within the study boundary. Fifteen Primark documents supplied claim and supporting-evidence material; five regulatory documents supplied assessment criteria; and six independent documents supplied contextual or challenging evidence. Nineteen documents were locally archived and hashed, while seven living Primark webpages remained online-only and were rechecked before extraction. The 15 Primark documents produced 58 reviewed claim units. Twelve negative or contradictory cases were then used to test the emerging patterns before five themes were accepted.

Table 4.1: Final documentary evidence and analytical role

Source role	Documents	Primary analytical use	Evidential boundary
Primark claim/evidence (P-CLAIM)	15	Claim wording, metrics, qualifications, scope and disclosed support	Company material is claim data, not independent proof
Regulatory (R-RULE)	5	CMA/CAP criteria for clarity, evidence, comparison and lifecycle scope	Guidance is not a case-specific ruling

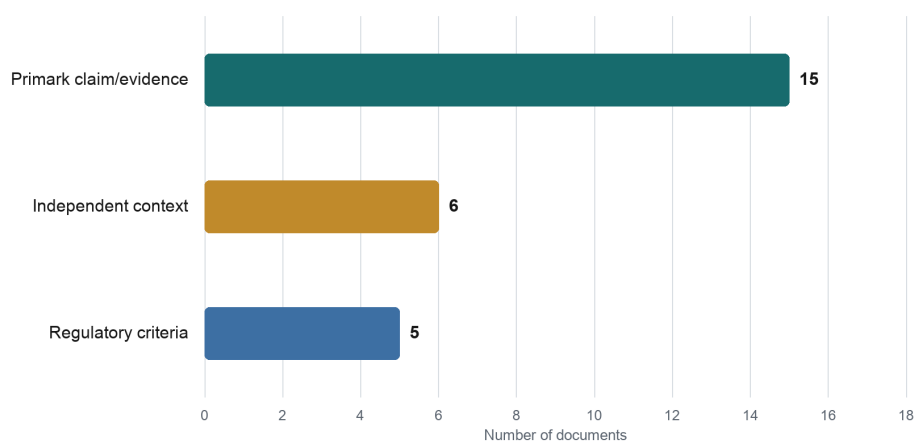
Source role	Documents	Primary analytical use	Evidential boundary
Independent context (I-CONTEXT)	6	Corroboration, challenge and negative-case testing	Context does not automatically establish the opposite conclusion
Total	26		

Source: Chapter 4 source register and screening log.

Figure 4.1: Documentary source mix by analytical role

Documentary source mix

Included public documents by analytical role (n = 26)



Company sources supplied claims; regulatory and independent sources supplied criteria and contextual challenge.

Source: Chapter 4 source register and screening log.

The coding counts reported below describe the purposefully selected claim units. Their function is to make the analytic coverage transparent rather than to support statistical generalisation.

4.2.1 Questions applied to the documentary evidence

Each Primark claim was read with enough surrounding material to preserve its wording, date, scope and qualification. The researcher then recorded the source, claim type, timeframe, metric or baseline, evidence route, lifecycle boundary and relevant CMA/CAP principle. Regulatory publications were not treated as respondents and independent publications were not treated as substitutes for Primark's statements. They not only served as assessment criteria but also as contextual challenges. Table 4.2 manifests a connection between the original research questions and this documentary interrogation explicitly.

Table 4.2: Research questions translated into documentary analytical questions

RQ	Question applied during analysis	Sources to which it was applied	Evidence produced
RQ1	What environmental benefit, activity, target or reported outcome is being claimed?	Fifteen Primark reports, reporting bases, webpages, glossaries and campaign communications	Six claim categories and 58 reviewed claim units
RQ2	What exact wording, timeframe, denominator, product scope, qualification and supporting route accompany the claim?	Primark claim documents read with linked reports, technical bases, glossaries and frameworks	Claim-level records of framing, metrics, exclusions, methods and evidence proximity
RQ3	What visible alignment or potential-risk indicator emerges when the claim and its context are read against named CMA/CAP principles?	Each reviewed claim, five regulatory documents and relevant independent context	34 clear/aligned, 18 partly evidenced, five unclear/potential-risk and one not-assessable outcome
RQ4	What recurring communication control follows from the clear, partial, unclear and contradictory cases?	Five accepted themes and 12 negative or contradictory cases	Findings-linked implications concerning qualification, version control, lifecycle conditions and comparable measures

Source: Chapter 3 analytical procedure and Chapter 4 claim-evidence matrix.

4.2.2 Who communicated what and how it informed the findings

Table 4.3 provides representative examples from the source trail. The extracts are public statements preserved from the identified documents. Reading the claim beside its qualification explains how source content became evidence for the research questions.

Table 4.3: Representative public statements and analytical treatment

Communicator and source	Recorded public statement	Qualification or contrasting evidence retained	Connection to the research questions
Primark (2025a), 2024/25 progress report	"74% of clothing units sold contained recycled or more sustainably sourced materials"	The reporting basis limits the measure to eligible clothing units meeting fibre-specific thresholds and excludes several product categories (Primark, 2025b)	Identifies a material-benefit claim (RQ1), its quantified framing and distributed qualification (RQ2), and a partly evidenced indicator (RQ3)
Primark (2025a), 2024/25 progress report	"Total value-chain emissions decreased 5.7% from the 2019 baseline"	The report separates a 71% reduction in market-based Scope 1 and 2 emissions from a 4% Scope 3 reduction	Identifies a carbon claim (RQ1) whose baseline and scope separation strengthen clarity and support (RQ2-RQ3)
Primark (2024a; 2024c), durability reporting and framework	"66% of tested socks, denim and jersey passed the aspirational 45-wash level"	The result concerns eligible tested categories; handwash and dry-clean items are excluded and 17 criteria are applied through approved laboratories	Connects an operational durability claim (RQ1) to method, category and testing boundaries (RQ2-RQ3)
Primark (n.d.c), live FAQ	"Primark Cares accounts for 50% of clothing sales"	Later dated reports record 66% and 74% under the updated materials measure (Primark, 2024a; 2025a)	Provides a version-control negative case and supports the need to reconcile living pages with current reports (RQ2-RQ4)
CMA (2021; 2024) and ASA (n.d.) publications	Environmental claims should be clear, accurate, substantiated and appropriately bounded across comparison and lifecycle	These are general and sector-level expectations, not findings about Primark	Supplies the external criteria for RQ3 without converting the analysis into a legal ruling

Communicator and source	Recorded public statement	Qualification or contrasting evidence retained	Connection to the research questions
University of Leeds (2023), WRAP (2023; 2024) and NGO publications	Independent sources reported durability, production-volume and synthetic-fibre context relevant to selected claims	Their scope varied and none verified Primark's complete environmental performance	Tests alternative interpretations and evidential limits, strengthening RQ3 and the practical implications in RQ4

Source: Chapter 4 source register, claim-evidence matrix and negative-case register.

4.3 From broad commitments to quantified claim repertoires

Six claim categories were identified. Circularity was the largest category in the coded set, followed by material or product benefits. Future targets, climate and carbon, packaging, and environmentally relevant sourcing completed the repertoire (Table 4.4).

Table 4.4: Reviewed claim units by claim category

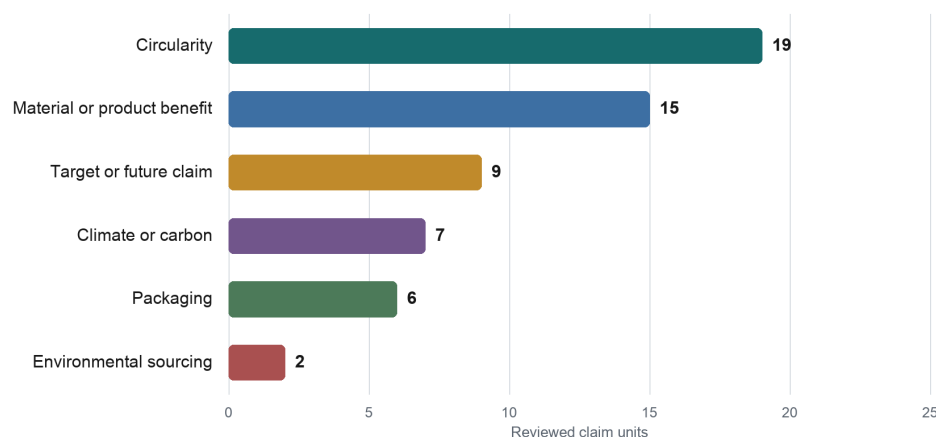
Claim category	Units	Typical form	Illustrative source IDs
Circularity	19	Circular design, durability, recyclability, repair and take-back	P01, P03, P05, P10-P13
Material/product benefit	15	Recycled or preferred fibres, composition thresholds and labels	P01-P09, P13, P15
Target/future claim	9	Dated strategy commitments and delivery pathways	P01, P07, P08, P12, P15
Climate/carbon	7	Value-chain target, baseline and scope-specific progress	P01, P03, P08, P14, P15
Packaging	6	Plastic removal, packaging footprint and waste diversion	P02, P04, P10, P15
Environmentally relevant sourcing	2	Cotton and fibre-sourcing methods	P06, P09
Total	58		

Source: Manual coding of 58 reviewed Primark claim and evidence units.

Figure 4.2: Distribution of reviewed claim units by category

Distribution of reviewed claim units

Claim categories in the purposively selected evidence (n = 58)



Counts describe the selected evidence and are not estimates of all Primark communications.

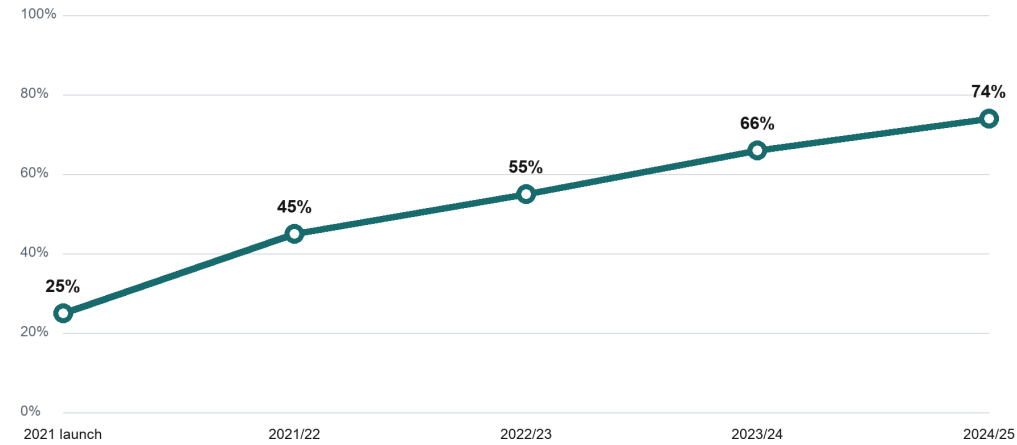
Source: Manual coding of 58 reviewed Primark claim and evidence units.

The temporal evidence showed a movement from broad ambition towards quantified progress. At the 2021 strategy launch, Primark reported that 25% of clothes were made using recycled or more sustainably sourced materials. They set a 2030 target for all clothing (Primark, 2021). The reported clothing-unit metric was subsequently increased to 45% in 2021/22, 55% in 2022/23, 66% in 2023/24 and 74% in 2024/25 (Primark, 2022, p. 5; 2023a, p. 17; 2024a, p. 34; 2025a). This sequence provides a visible target-progress structure. However, the figures were not whole-range impact measures. They depended on fibre-specific minimum content and a denominator that excluded several product categories (Primark, 2024b; 2025b).

Figure 4.3: Reported progression of clothing units using qualifying materials

Reported clothing units using qualifying materials

Annual percentage reported against the 2030 materials commitment



The series is a scoped clothing-unit measure; fibre thresholds and category exclusions remain material.

Source: Primark (2021; 2022; 2023a; 2024a; 2025a). The series remains subject to the reporting-basis definitions and exclusions.

Therefore, broad positioning coexisted with bounded metrics. Phrases such as making "more sustainable choices affordable for all" established a business-wide impression, whereas the reports measured selected attributes, units and programmes (Primark, 2021).

4.4 Evidence was substantive but distributed across document layers

The second theme concerned where substantiation appeared. Annual reports supplied headline percentages and year-on-year movement. Separate basis-of-reporting documents supplied definitions, denominators, exclusions, calculation methods, assumptions and limited-assurance statements. The fibre glossary supplied material-specific composition thresholds and certification routes. On the other hand, durability and circular-product frameworks supplied technical criteria. Thus, substantiation was present. However, it was frequently distributed across several genres.

For example, the 74% materials figure was defined as eligible clothing units containing qualifying fibres in the main body of the item. Footwear, accessories, homeware, health and beauty, and other categories were excluded (Primark, 2025b, pp. 2-3). The customer fibre guide further showed that qualifying thresholds varied substantially. Recycled cotton could appear at minimum levels of 15%, 20% or 25%, whereas recycled polyester was generally stated at a 50% minimum (Primark, 2023c). It also clarified that a fibre claim might apply only to the relevant part of a complex product. These details strengthened specificity under the CMA's fabric, composition and lifecycle principles, although their separation from headline percentages created a proximity limitation (CMA, 2021b; 2024).

The same pattern can be seen in assurance. Primark reported limited external assurance over specified metrics or statements instead of presenting the complete communication portfolio as audited (Primark, 2022; 2025b). Reporting-basis documents disclosed assumptions, such as using cotton intake proportions to estimate cotton clothing-unit sales and extrapolating missing packaging data (Primark, 2023b; 2025b). The 2024 packaging footprint used an average of 55% actual supplier-response data, with tertiary packaging outside the metric (Primark, 2025b, pp. 6-7). This disclosure bounded interpretation of the headlines.

A contrasting result emerged from the live FAQ. It retained a statement that the Primark Cares range represented 50% of clothing sales and used older figures, although later dated reports recorded 66% and 74% materials metrics (Primark, n.d.c; 2024a; 2025a). The issue was not lack of later evidence. Rather, it was inconsistent version control across a still-public communication channel.

4.5 Circularity and durability were operationalised but bounded

Circularity claims became more measurable across the period. The 2023/24 report stated that 3% of clothing-unit sales met Primark's Circular Product Standard. This included 11% of T-shirts and 5% of denim. In 2024/25 the overall figure rose to 5%, with 20% of jersey and 8% of denim (Primark, 2024a, p. 39; 2025a). The updated standard defined circular by design through three elements, namely, qualifying materials, durability and recyclability (Primark, 2026). These results showed scaling. It also manifested category concentration. For example, most clothing units remained outside the metric.

The supporting basis imposed further boundaries. Circular products generally are required to maintain certain standards, such as at least 95% specified cotton, foundational durability performance and technical recyclability at commercial scale. Primark also disclosed that its definition was voluntary. There exists no universal clothing-recyclability definition. Some product categories could not meet the criteria under current technology, and certain durability failures could be subject to commercial review (Primark, 2025b, pp. 3-5). Accordingly, the finding did not indicate that Primark had become circular. Instead, it demonstrated that Primark had developed a transparent internal standard capable of producing bounded progress measures.

Durability showed the strongest operational detail. The framework distinguished foundational, progressive and aspirational levels at 23, 32 and 45 wash intervals and assessed garments against 17 criteria through approved laboratories. Handwash and dry-clean items were excluded (Primark, 2024c, pp. 7-8). Primark reported that 66% of eligible tested socks, denim and jersey reached the aspirational 45-wash level in 2023/24 (Primark, 2024a, p. 37). Independent University of Leeds testing also found that price did not predict durability across 65 multi-brand garments, although that study did not assess Primark's complete range (University of Leeds, 2023). Together, the evidence supported the existence of a testing system, not a universal conclusion about all products.

End-of-life wording produced a sharper boundary. Primark's glossary defined recyclable by design as the *possibility* of future recycling, yet the first circular-collection release told customers that items could be recycled and referred to donation points available only in selected markets (Primark, n.d.a; 2023d). The difference between design intention and available recycling outcomes created a potential lifecycle-clarity risk under CMA and CAP guidance, without establishing that the products were non-compliant (CMA, 2021b; Advertising Standards Authority, n.d.).

4.6 Target progress remained sensitive to scope and system conditions

Carbon communication combined a broad 2030 value-chain target with increasingly differentiated progress. In 2023/24 total emissions were reported as 0.6% below the 2018/19 baseline and 11.5% below the previous year. The report attributed the annual decline partly to an approximately 5% reduction in material procurement, alongside decarbonisation activity and wider trends, and stated that Scope 3 comprised 98.8% of the footprint (Primark, 2024a, pp. 45-47). In 2024/25 the cumulative reduction reached 5.7%, comprising a 71% fall in market-based Scope 1 and 2 emissions and a 4% fall in Scope 3 emissions (Primark, 2025a). This separation reduced the risk of operational reductions being presented as equivalent to value-chain progress.

The target was supported by an SBTi-validated near-term target and a linked transition plan, but validation concerned target design rather than achievement (Primark, n.d.b). The reports also acknowledged reliance on industry-average Scope 3 data and supplier action. WRAP's sector evidence provided an important negative case: per-tonne carbon and water improvements could be offset by growth in production volume (WRAP, 2023; 2024). Because the selected Primark documents did not disclose a comparable production-volume series, the claim that scale itself produced a net environmental benefit was classified as not assessable rather than contradicted.

Packaging and operational-waste communication revealed a similar relationship between headline progress and technical scope. The live FAQ estimated that more than 600 million unnecessary plastic components had been removed since 2019 and stated that the 2027 target was on track (Primark, n.d.c). The reporting basis instead measured packaging in tonnes, combined observed supplier data with extrapolation and excluded tertiary packaging; only around 55% of the 2024 supplier data was actual rather than estimated (Primark, 2025b, pp. 6-7). The two units could not be reconciled from the FAQ. Likewise, its 95% waste-diversion statement referred to directly controlled operations, while the technical definition included incineration alongside recycling, recovery and composting. These findings did not invalidate the activities, but they made comparable units and proximal definitions material to interpretation.

Independent sources were used to challenge, rather than replace, this reading. Changing Markets Foundation (2023, pp. 22-24) reported that synthetic fibres remained material within Primark's disclosed fibre profile, complicating any inference that a higher preferred-material percentage represented total material impact. Its earlier report also questioned the sector's use of certification, take-back schemes and heavily promoted small collections (Changing Markets Foundation, 2022, pp. 63-70). These advocacy findings were dated and were not regulatory decisions. Hence, they were retained as negative cases as opposed to treated as proof about current claims. Fashion Revolution (2024) provided a complementary boundary. Its index measures public disclosure and expressly does not verify sustainability performance. This supported the chapter's distinction between improved transparency and verified environmental outcomes.

4.7 Compliance-risk synthesis and findings-level RQ answers

The regulatory assessment produced 34 clear/aligned indicators, 18 partly evidenced units. Apart from that, it also generated five unclear or potential-risk indicators and one not-assessable unit. These are descriptive coding outcomes. They don't represent a compliance score.

Table 4.5: Regulatory assessment outcomes

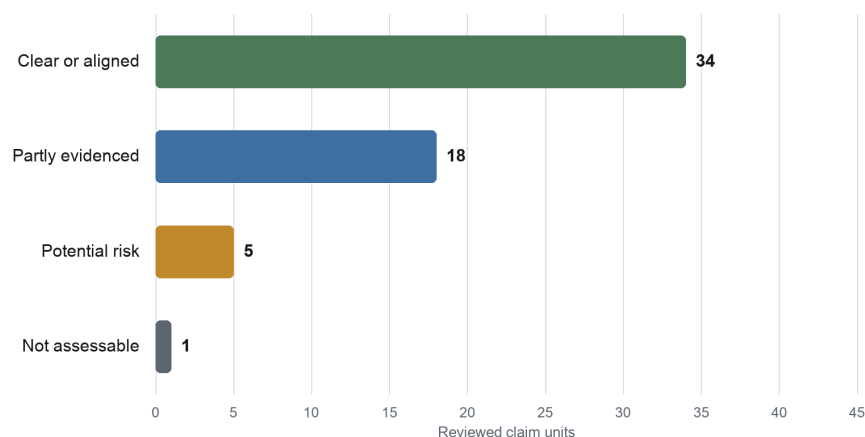
Outcome	Units	Main documentary pattern
Clear/aligned indicator	34	Defined metrics, thresholds, scope, methodology or explicit limitation
Partly evidenced	18	Support existed but a material qualification or pathway was remote or incomplete
Unclear/potential risk	5	Lifecycle condition, favourable definition, stale figure or non-comparable unit affected clarity
Not assessable	1	Public evidence was insufficient for a system-level conclusion

Source: Claim-to-principle assessment of 58 reviewed units using the CMA/CAP lens.

Figure 4.4: Distribution of green-claims assessment outcomes

Green-claims assessment outcomes

Claim-to-principle coding outcomes across 58 reviewed units



These are descriptive risk indicators under the CMA and CAP lens, not findings of legal compliance.

Source: Chapter 4 claim-to-principle assessment. Outcomes are descriptive indicators rather than legal determinations.

Five potential-risk indicators are concentrated on communication architecture. They are as follows: the older broad 2027 recyclability target, a collection-level recycling statement whose infrastructure conditions were remote, a 95% waste-diversion statement whose technical definition included incineration and only directly controlled operations, a live FAQ containing superseded materials figures and a plastic-progress statement using cumulative component counts that did not reconcile visibly with tonnes-based reporting. This pattern supports a cautious conclusion, that is, risk arose mainly where otherwise substantive evidence was not close to the claim, not current, or not expressed in comparable units.

Table 4.6: Findings-level base answers to the research questions

RQ	Base answer from the documentary findings
RQ1	Claims covered materials, circularity, durability, climate, packaging, sourcing and future targets, with increasing use of quantified progress metrics.
RQ2	Support was strongest when reports, technical bases, glossaries and frameworks were read together; important scope and qualification were often distributed across those layers.

RQ	Base answer from the documentary findings
RQ3	Most units were clear or partly evidenced. Residual risk indicators concerned breadth, proximity, lifecycle conditions, metric comparability and version control; no legal breach was determined.
RQ4	Communication could be strengthened by co-locating definitions and exclusions, labelling proprietary standards, stating end-of-life conditions, reconciling living pages, and retaining consistent units, baselines and scope.

Source: Synthesis of the reviewed claim matrix, negative cases and accepted themes.

4.8 Chapter summary

The findings show a maturing and increasingly quantified claim system supported by substantial documentary detail. Its main limitation was fragmentation: the evidence capable of bounding a claim often sat outside the communication in which the claim was most prominent. Chapter 5 interprets, rather than repeats, these patterns through signalling, legitimacy and institutional perspectives and develops their managerial implications.

Chapter 5 - Discussion

5.1 Introduction

This chapter interprets the Chapter 4 findings against the theoretical and regulatory framework developed in Chapter 2. It does not repeat the descriptive results. Instead, it explains what the five themes mean for signal credibility, organisational legitimacy, institutionalised sustainability communication and green-claims risk. It provides answers for each research question directly. Aside from that, it also develops evidence-bounded theoretical and managerial implications. The interpretation remains limited to public communication. It neither verifies Primark's environmental performance nor attributes private motives or legal liability.

5.2 Integrated interpretation of the findings

The central finding is a tension between increasing evidential sophistication and continuing communicative fragmentation. Primark's sustainability claims became more quantified over the study period. On the other hand, reporting bases, glossaries and technical frameworks made their definitions and limitations increasingly visible. This supports a stronger interpretation compared to either of two extremes. The evidence does not show evidence-free environmental rhetoric. On the other hand, the existence of detailed evidence does not also make every headline, campaign or living webpage self-sufficient.

The five Chapter 4 themes form one connected explanation. Broad commitments developed into measurable claim repertoires. First, evidence became substantial and distributed. Second, circularity and durability were formalised through bounded standards. Third, target progress became more assessable although remained sensitive to scope and system conditions. Fourth, residual risk concentrated where claims and qualifications were separated, inconsistent or expressed in incompatible units. This relationship is summarised in Table 5.1.

This integrated result complicates literature which contrasts corporate talk with action at organisational level. Walker and Wan (2012) demonstrate the risks associated with symbolic environmental communication. Nyilasy, Gangadharbatla and Paladino (2014) on the other hand, show that perceived inconsistency between advertising and performance can damage consumer responses. The present findings cannot test either performance inconsistency or consumer reaction. They instead identify an earlier point in the credibility chain. Inconsistency can arise between the claim and the organisation's own public evidence architecture. A current, bounded claim may be supported even when broader performance remains unverified. Conversely, a stale or over-broad message may create risk despite stronger evidence elsewhere. As a consequence, the contribution is to locate credibility tension at claim level before making outcome-based judgements.

Table 5.1: Findings-to-theory interpretation

Chapter 4 theme	Primary theoretical interpretation	Critical boundary
Broad commitments to quantified repertoires	Quantification raises signal evaluability and supports accountability	A precise metric may still sit beneath a broader strategic impression
Distributed evidence architecture	Signal quality depends on accessibility as well as technical strength	Expert-facing evidence may not qualify a consumer-facing claim sufficiently
Bounded circularity and durability standards	Formal standards institutionalise meaning and create repeatable signals	Proprietary criteria and infrastructure conditions limit generalisation
Measurable but conditional target progress	Repeated reporting supports dynamic legitimacy and target accountability	Baselines, volume effects and Scope 3 uncertainty constrain causal interpretation
Risk in breadth, proximity and version control	Green-claims risk arises from the claim-evidence-context relationship	Potential risk is not a legal finding or proof of intent

Source: interpretation of the five accepted Chapter 4 themes through the Chapter 2 framework.

5.3 Signal quality, specificity and the accessibility of evidence

Signalling Theory provides the clearest explanation on the significance of the movement from broad commitments to quantified claims. Under information asymmetry, an organisation makes otherwise difficult-to-observe qualities visible through signals (Spence, 1973; Connelly *et al.*, 2011). Primark's annual percentages, baselines, composition thresholds, testing levels, certification references and reporting methodologies all function as evidence-bearing signals. Compared with a general promise to make fashion "more sustainable", a claim stating a percentage, year, scope and method provides more information which can be evaluated or challenged. This supports Atkinson and Rosenthal's (2014) argument that specificity can strengthen the credibility of environmental communication.

The findings nevertheless qualify a simple equation between quantification and credibility. The materials series from 25% at strategy launch to 74% in 2024/25 appears precise. However, its meaning depends on fibre-specific minimum content, an eligible-clothing denominator and excluded product categories. The metric is a relatively strong signal for progress under Primark's defined protocols. On the other hand, it is a weaker signal of total product or business impact. This illustrates Connelly *et al.*'s (2011) distinction between signal observability and signal quality. A visible number is not necessarily informative about every proposition that audiences may attach to it.

Signal bundles can prove to be more useful than isolated indicators. A materials percentage becomes more interpretable when combined with the fibre glossary, composition threshold, reporting basis and assurance statement. Likewise, circularity claims become more evaluable when the sales percentage is connected to the Circular Product Standard, durability framework and technical limitations. Kirmani and Rao (2000) emphasise that signal credibility depends partly on the costs and constraints attached to it. A repeatable reporting methodology, specified testing regime or externally governed certification is harder to reproduce casually compared to an unqualified slogan. The finding that 34 units showed clear or aligned indicators and 18 were partly evidenced is consistent with an evidence system containing many substantive signals as opposed to symbolic cues alone.

However, the case extends signalling analysis by showing that *location* is part of signal quality. Technical detail in a reporting-basis document may be accessible to analysts and still remain remote from a headline or FAQ read by a non-specialist audience. Signalling is receiver-sensitive and audiences differ in knowledge, time and capacity to follow a chain of links (Connelly *et al.*, 2011). Du, Bhattacharya and Sen (2010) similarly argue that communication effectiveness depends on how corporate responsibility information is conveyed. Chapter 4 pattern suggests a distinction between **evidence availability** and **evidence usability**. Primark often demonstrated better performance on availability. On the other hand, residual risk arose where users had to connect several genres to understand scope.

This distinction provides an explanation on the contrasting evaluation of the fibre glossary and the live FAQ. The glossary provided multiple information, such as material-specific definitions, certification routes, minimum percentages and product-part qualifications. These emerge as high-information signals. By contrast, the FAQ retained an older 50% materials figure even though later reports had moved to 66% and 74%. The problem did not arise from the absence of a stronger signal elsewhere. Instead, it stemmed from two public channels emitting temporally inconsistent signals. Such inconsistency can reduce the reliability of the overall signal bundle even when the latest report is well substantiated.

The durability evidence also illustrates appropriate signal boundaries. The 23-wash, 32-wash and 45-wash tiers, 17 test criteria along with approved laboratories create a traceable technical signal. A study by the independent University of Leeds solidifies the claim that price is not sufficient to predict durability. However it fails to verify Primark's entire range. As a result, a credible interpretation preserves the exact proposition supported by each signal. This evidence-sensitive reading aligns with Lyon and Montgomery's (2015) warning which states that environmental communication should be differentiated by what is disclosed, omitted and implied.

5.4 Legitimacy, institutional pressure and the formalisation of claims

According to Legitimacy Theory, these signals are placed within wider expectations about appropriate corporate conduct. Sustainability communication may support pragmatic legitimacy by promising customer value. In addition to that, it supports moral legitimacy by presenting responsible action and cognitive legitimacy by making environmental concepts understandable (Suchman, 1995). Primark's combination of affordability with sustainability addresses pragmatic concerns directly. It describes environmental improvement to be compatible with value retail. Annual reporting, technical definitions and progress metrics demonstrates accountability and normalises a vocabulary of preferred materials, circular design and value-chain decarbonisation. Therefore, they support moral and cognitive legitimacy.

The evidence challenges the notion that Primark's private motive was to seek legitimacy. Nevertheless, the public documents show legitimacy work in their structure. The organization can position itself against stakeholder expectations and criticism by issuing broader statements on integrated sustainability, transfer in progress and low prices.. O'Donovan (2002) describes disclosure as a means through which organisations may gain, maintain or repair legitimacy aligning with the shift in expectations. Primark's shift from a separate Primark Cares label towards product-level fibre information can be interpreted as an adjustment in legitimacy strategy. The communication moved from a limited environmental range towards the claim that qualifying materials had become embedded across a larger share of clothing.

Institutional Theory explains the manner in which formal frameworks became central to this shift. A range of factors, such as CMA scrutiny, CAP requirements, recognised fibre standards, SBTi validation, WRAP collaboration and circular-economy guidance represent coercive, normative and mimetic pressures which can shape acceptable communication (DiMaggio and Powell, 1983). Primark's reporting bases and technical standards translate those expectations into internal definitions, thresholds and review processes. This resembles Meyer and Rowan's (1977) account of formal structures which demonstrate conformity to institutional expectations.

Formalisation possesses substantive communicative value. It makes terms repeatable and allows annual comparison. It also constrains what can be counted. For example the Circular Product Standard prevents "circular by design" from remaining an entirely open adjective. Circular Product Standard links it with materials, durability and recyclability criteria. In a similar manner, the durability framework creates tiered performance requirements. As a result, these structures provide evidence of organisational systems and improve disclosure discipline.

However, institutional adoption can not be equated with environmental outcomes. Meyer and Rowan (1977) alerts against the possibility of formal structures becoming ceremonial. According to Cho *et al.* (2015), sustainability reporting may accommodate demands which are conflicting, due to organisational façades. The case evidence does not prove or disprove this kind of decoupling. Although it reveals the boundary clearly. The existence of Primark's proprietary circularity definition stems from the fact that no universal clothing-recyclability standard is available. Apart from that, actual recycling also relies on product category, technology and local infrastructure. The standard considered as an internal governance device may prove to be meaningful. On the other hand, its legitimacy is stronger when it is explicitly labelled as Primark-defined. Its limitations travel with the claim.

Over the period of time, dynamic legitimacy can become reliant on consistency. Repeated annual makes progress contestable. As a result, it can help in maintaining legitimacy. On the contrary, stale living pages can weaken the same process. A superseded figure suggests fragmented governance even though newer reports disclose improvement. Bansal and Clelland (2004) associate environmental legitimacy with the management of information uncertainty. According to that perspective, version control does not indicate clerical housekeeping. Infact, it is part of legitimacy maintenance as audiences need confidence that the organisation's current public account is coherent.

The distinction between symbolic and substantive legitimation is better treated as a continuum compared to a binary classification. Several factors, such as metrics, methods, limited assurance and technical testing provide substantive elements. Broad affordability-sustainability positioning and umbrella language provide symbolic framing. Ashforth and Gibbs (1990) manifests a caution that symbolic management can become counterproductive when it appears disconnected from substance. Primark's strongest communication combined the two. Accessible strategic meaning is supported by a visible evidence route. Its weaker cases arose in cases where the symbolic breadth exceeded the immediately visible qualification.

5.5 Interpreting the compliance-risk pattern

The regulatory findings reinforce differentiated as opposed to accusation-based accounts of greenwashing. Delmas and Burbano (2011), de Freitas Netto *et al.* (2020) and Seele and Gatti (2017) show that greenwashing has multiple forms and some definitions may depend on external accusation. The present study did not test actual performance or consumer deception. Therefore, it cannot label Primark's overall communication as greenwashing. The defensible contribution it provides proves to be narrower. It identifies the cases where the relationship between wording, context and disclosed support creates potential risk under named principles.

Most coded units were aligned or partly evidenced. Otherwise, a discussion focused only on the five potential-risk indicators would distort the balance of the evidence. The risk pattern did not indicate wholesale evidential absence. In fact, It was architectural. Qualifications were sometimes remote. An end-of-life claim compressed technical and infrastructural conditions. Apart from that, a waste-diversion percentage used a favourable shorthand for a definition which included incineration. An FAQ was not synchronised with dated reports. In addition to that, cumulative plastic-component counts could not be compared directly with tonnes-based reporting.

These issues map closely to CMA requirements in order to ensure several conditions, such as clarity, material information, fair comparison, lifecycle boundaries and substantiation (CMA, 2021a; 2024). CAP guidance requires a clear basis and appropriate qualification in order to establish broad environmental claims (ASA, n.d.). The findings demonstrate that potential risk can persist *within an evidence-rich system*. A company can be equipped with methodology and supporting data. However, the communication can still be vulnerable if the qualification is not sufficiently prominent, current or expressed in a commensurable unit.

This supports Lyon and Montgomery's (2015) treatment of greenwash as differentiated selective disclosure. It also resonates with Hahn and Lülfs (2014), who show that positive and negative aspects can be managed by using different disclosure strategies. In this particular case, reporting-basis documents openly acknowledge assumptions and limitations. It can contribute to reducing risk. The more difficult issue was to evaluate if those limitations were visible during the formation of broader impressions.

The one not-assessable unit provides an important critical-realist boundary. Primark's argument indicates, its scale enabling positive impact could not be evaluated without comparable production-volume and total-impact data. WRAP's sector evidence shows that per-tonne improvements may be offset by greater volume. However, sector findings cannot be attributed directly to Primark. Classifying the claim as not assessable emerged as more rigorous compared to treating missing public evidence as proof of a negative outcome.

5.6 Direct answers to the research questions

5.6.1 RQ1: What types of claims does Primark make?

Primark makes six main types of sustainability and green marketing claim in the selected communications. These are as follows: circularity, product benefit, future target, climate or carbon, packaging and environmentally relevant sourcing. Circularity and materials were most prominent in the units selected purposfully. The repertoire combined broad strategic positioning with increasingly quantified annual progress. With regard to theoretical terms, it operated as a portfolio of signals. Some claims communicated organisational direction. On the other hand, other claims supplied measurable evidence of defined activities or outcomes. The answer applies to the selected evidence and does not estimate the prevalence of all Primark claims.

5.6.2 RQ2: How are claims framed, qualified, scoped and supported?

Claims were framed through a layered evidence architecture. Progress reports supplied headline metrics and trends. Reporting bases provided a range of elements, namely, definitions, denominators, exclusions, assumptions and assurance. Apart from that, glossaries supplied material thresholds. Lastly, technical frameworks provided circularity and durability criteria. As a result, support was often substantive. However, important qualification could be remote from the most prominent claim. Signal credibility depended on specificity and evidence quality. It is also contingent upon whether the intended audience could connect the layers. Multiple factors, such as product-part, category, denominator, timeframe and lifecycle boundaries were especially important.

5.6.3 RQ3: What alignment and compliance-risk indicators emerge?

The dominant pattern was alignment or partial evidence. Thirty-four units displayed clear or aligned indicators and 18 were partly evidenced. Five potential-risk indicators and one not-assessable unit were present. The potential risks concerned broad or conditional recyclability wording and the technical meaning of waste diversion. It also stemmed from stale FAQ figures, incompatible plastic metrics and insufficient data for a system-level scale claim. These outcomes indicate in which cases claim governance should be strengthened maintaining CMA/CAP principles. However, they do not constitute findings of breach, unlawfulness or intent.

5.6.4 RQ4: What practical implications arise?

The main implication indicates that claim governance should move from ensuring that evidence exists to ensuring that evidence is usable at the point of communication. Definitions, product exclusions and minimum-content thresholds should be co-located with headline percentages. Proprietary standards need to be labelled explicitly. On the other hand, end-of-life claims should state required consumer actions and infrastructure conditions. Living pages should be reconciled with dated reports. Lastly, activity counts should not substitute for comparable impact metrics. Future targets must retain multiple elements, such as baseline, scope, methodology, pathway and progress in one accessible evidence route.

5.7 Theoretical contribution and managerial implications

From a theoretical perspective, the study contributes through integrating signalling with legitimacy on a claim-level. Signalling theory explains the informational strength possessed by metrics, methods and standards. On the other hand, Legitimacy theory explains the reason behind placing these signals within broader narratives of responsibility and affordability. Apart from that, Institutional theory describes the process of forming recurring definitions and reporting structures. The findings manifest proximity, version coherence and cross-document connectivity as the properties of signal quality. A technically strong evidence base can still produce weak communication if the receiver has to reconstruct the proposition from scattered documents.

From a managerial perspective, this suggests a claim-evidence governance model with four controls. First, each public claim must have a defined proposition and owner. Secondly, elements such as qualifying scope, method and evidence link should travel with the claim across channels. Thirdly, metrics need to use consistent units and versions. Fourthly, high-risk terms such as circular, recyclable, sustainable and on track must be able to trigger review against the latest CMA fashion guidance and CAP lifecycle rules. These controls would support legitimacy through disciplined transparency as opposed to a larger volume of sustainability messaging.

The findings also refine the integrated framework developed in Chapter 2. That framework moved from public claim, through signal design and legitimacy work, to regulatory assessment and practical implications. Chapter 4 indicates the significance of an intermediate **evidence-connectivity** stage. Signal design should be assessed not only through specificity, method and scope, but through three relational tests. Such as proximity, consistency and commensurability. Proximity concerns with the availability of material qualification where the claim is encountered. Consistency asks whether reports, labels, FAQs and technical documents communicate the same current account. Commensurability analyzes whether progress measures use units and baselines which permit meaningful comparison. These conditions help explain why detailed evidence may coexist with residual risk. It provides a more precise theoretical route from disclosure to credibility.

The implications prove to be proportionate to the method. The study cannot show how consumers actually interpreted the claims or if operational performance matched every assertion. It demonstrates how public communication can be made more internally coherent and externally inspectable. It also manifests less exposure of public communication to avoidable green-claims risk.

5.8 Chapter summary

The discussion shows that Primark's sustainability communication has developed from broad commitment signalling and emerged as a more quantified and institutionally structured evidence system. Its credibility is strongest in cases where claim, scope, method and qualification are connected. Residual risk arises primarily from several aspects, such as fragmented evidence, conditional lifecycle language, incompatible measures and stale pages. The four research questions are answered through one overarching conclusion: credible sustainability marketing depends on evidence that is not only available, but current, bounded and usable by the audience. Chapter 6 consolidates the contribution, recommendations, limitations and future research.

Chapter 6 - Conclusion and Recommendations

6.1 Introduction

This chapter concludes the study with regard to its aim, objectives and research questions. It accumulates and presents the findings, contribution, recommendations and limitations.

6.2 Conclusions against the aim and objectives

The main purpose of this study is to evaluate how Primark communicates and substantiates sustainability and green marketing strategy claims. In addition to that, it also tries to assess potential compliance risk by using qualitative thematic analysis. The evidence supports a qualified conclusion. Primark's communication has evolved into a more quantified system of targets, annual metrics, reporting bases, technical frameworks and product-level definitions.. This development makes many claims more inspectable. On the other hand, credibility depends on how closely the qualification travels with the claim.

Objective 1 was achieved by identifying six claim categories across 58 reviewed units. Circularity and product-benefit claims emerge as most prominent. Other prominent claims are as follows: future targets, climate or carbon, packaging and environmentally relevant sourcing. Objective 2 showed that support was often substantive and still distributed. Headline reports communicated progress. On the other hand, separate reporting bases, glossaries along with frameworks supplied multiple factors, such as denominators, exclusions, thresholds, assumptions and assurance boundaries. As a result, the principal weakness was not always absence of evidence, but rather the effort required to connect it.

Objective 3 evaluated the selected claims through the lens of CMA and CAP. Thirty-four units displayed clear or aligned indicators and 18 were partly evidenced. Apart from that, five contained potential-risk indicators and one was not assessable. The residual issues concerned a plethora of factors, namely, broad or conditional lifecycle wording, favourable technical definitions, stale webpage figures and non-comparable units. These findings indicate areas of communication risk. Objective 4 was met by translating those patterns into practical controls for clarity, currentness, scope and substantiation.

Consequently, the research questions can be answered through one overall finding. Primark makes a varied and increasingly measurable set of green claims. That structure is most credible when several factors, such as claim, definition, scope, method and limitation are connected at the point of communication. Potential risk increases when those elements are remote, temporally inconsistent.

6.3 Recommendations

1. **Create a single claim-evidence record.** Each material public claim should include multiple factors, such as accountable owner, approved wording, scope, metric, supporting source and review date. Consumer-facing pages should link directly to the current record instead of requiring users to reconstruct support across several documents.
2. **Apply version control across channels.** Living webpages, FAQs, campaign pages and reports should be reviewed together whenever a new annual figure is released. Superseded claims should be updated or clearly dated in order to protect stronger recent evidence from the damage of an older public statement.
3. **Place material qualifications beside the claim.** In the process of forming principal impression, factors such as product exclusions, minimum fibre thresholds, proprietary definitions and infrastructure conditions should be visible. Terms such as circular, recyclable and waste diverted should state the relevant design, collection, treatment and geographic boundaries.
4. **Use comparable measures and disclose assurance limits.** Progress claims should handle retention of consistent units, baselines and denominators across the timeline. When activity counts and impact measures differ, their relationship should be explained. Assurance should be described as applying to specified metrics. It should not apply to complete sustainability narrative.

6.4 Contribution and implications

The study contributes a claim-level account of evidence connectivity. It contributes to differentiating between availability of evidence, and usability of evidence. It manifests several elements, such as proximity, consistency and consumability as practical conditions of credible signaling. With regard to managers, the implication is that claim governance should address the relationship between a statement and its support.

6.5 Limitations and future research

Purposefully created single-case design is not able to estimate the prevalence of all Primark claims. It also fails to support statistical generalization. Public company documents may try to privilege those disclosures which are favorable to the company. However, living webpages can change over time. Consumer interpretation was not measured by the study. It did not conduct an independent test on environmental performance. Apart from that, the study neither investigated internal decision-making nor determined legal compliance. One researcher conducted the whole process of coding. Although the transparency was strengthened by several factors, such as a recorded codebook, negative-case review and source trail

Future research can use this evidence-connectivity pattern in order to compare it with different fashion retailers. It can examine the impression of claims on consumers when qualifications are placed at different distances. In addition to that, it can also evaluate the possibility of regulatory decisions corresponding with the risk indicators that are mentioned here. Longitudinal work could also assess the possibility of webpage version control as well as metric comparability improving with the development of green-claims regulation.

6.6 Final conclusion

Credibility emerged as strongest through specific and current public claims which are directly connected to their evidential boundaries. The central managerial task is to make use of substantiation in cases where the claim is encountered.

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Appendices

Appendix A - Chapter 2 Literature and Framework Traceability

Appendix Table A1: Literature streams, analytical contribution and transfer boundary

Literature area	Key sources	Contribution	Use in Chapters 4-5	Boundary
Sustainability marketing	Peattie and Crane (2005); Polonsky and Rosenberger (2001); Belz and Peattie (2012)	Positions environmental communication within strategy, value and ecological limits	Establishes why claims must be analysed as strategic communication rather than isolated wording	Does not verify Primark's ecological performance
Environmental claims	Carlson, Grove and Kangun (1993); Banerjee, Gulas and Iyer (1995); Leonidou <i>et al.</i> (2011)	Differentiates product, process, image, factual and associative environmental claims	Informs the Chapter 4 claim repertoire	Classification does not determine accuracy or compliance
Greenwashing and disclosure	Delmas and Burbano (2011); Lyon and Montgomery (2015); de Freitas Netto <i>et al.</i> (2020); Seele and Gatti (2017)	Shows that greenwashing is heterogeneous and can involve omission, vagueness, selective emphasis or accusation	Supports differentiated risk categories rather than a binary company label	No accusation is inferred without case-specific authoritative evidence
Credibility and response	Nyilasy, Gangadharbatla and Paladino (2014); Chen and Chang (2013); de Jong, Huluba and Beldad (2020)	Explains why inconsistency and ambiguity may affect credibility	Provides the interpretive context for claim-evidence coherence in Chapter 5	Consumer perceptions and behaviour are not measured in this study
Signalling Theory	Spence (1973); Kirmani and Rao (2000); Connelly <i>et al.</i> (2011); Atkinson and Rosenthal (2014)	Explains specificity, observability, signal quality and receiver interpretation under information asymmetry	Used to interpret metrics, methods, certification, scope and evidence accessibility	Signals do not prove underlying ecological outcomes
Legitimacy Theory	Suchman (1995); Ashforth and Gibbs (1990); Bansal and Clelland (2004); O'Donovan (2002)	Explains pragmatic, moral and cognitive legitimacy and symbolic/substantive communication	Used to interpret affordability positioning, reporting and version coherence	Does not establish Primark's private motives

Literature area	Key sources	Contribution	Use in Chapters 4-5	Boundary
Institutional Theory	Meyer and Rowan (1977); DiMaggio and Powell (1983); Cho <i>et al.</i> (2015); Hahn and Lülfs (2014)	Explains formalisation, isomorphism, ceremonial structures and disclosure strategies	Used to interpret reporting bases, technical standards and external pressure	A standard does not establish ecological impact
Regulatory principles	CMA (2021a; 2021b; 2024); ASA (n.d.)	Supplies observable criteria for clarity, material information, comparison, lifecycle and substantiation	Operationalised in the Chapter 4 regulatory lens	Guidance is not a case-specific legal ruling
Thematic document analysis	Bowen (2009); Braun and Clarke (2006; 2019; 2021a; 2021b); Nowell <i>et al.</i> (2017); Gioia, Corley and Hamilton (2013)	Supports provenance, reflexive coding, theme development and an inspectable abstraction trail	Structures the source matrix, 58 claim units, negative cases and theme audit	The study does not claim formal inter-coder reliability or full Gioia methodology

Source: Chapter 2 source matrix and integrated theoretical framework.

Appendix B - Chapter 4 Evidence and Coding Transparency

Appendix Table B1: Representative claim-to-evidence-to-assessment trail

Claim ID	Public claim or evidence unit	Documentary qualification retained	Assessment outcome	Theme / RQ
001	74% of clothing units contained recycled or more sustainably sourced materials	Minimum-content protocols and excluded product categories are located in the reporting basis and fibre glossary	Partly evidenced	T1 / RQ1-RQ3
003	Total value-chain emissions decreased 5.7% from the 2019 baseline	Scope 1 and 2 fell 71%, while Scope 3 fell 4%; prior reporting disclosed data and volume effects	Clear/aligned indicator	T4 / RQ1-RQ3
006	Circular by design requires materials, recyclability and durability criteria	The criteria are Primark-defined and apply only to eligible products	Clear/aligned indicator	T3 / RQ1-RQ3
007	No universal definition of recyclable clothing exists	Supplier, laboratory, technology and commercial-pass limitations are disclosed	Clear/aligned indicator	T3 / RQ2-RQ3
013	66% of tested socks, denim and jersey reached the 45-wash level	Result is limited to eligible tested categories; handwash and dry-clean items are excluded	Clear/aligned indicator	T3 / RQ1-RQ3
015	Emissions were 0.6% below baseline and 11.5% below the previous year in 2023/24	Annual decline was associated partly with lower material procurement; Scope 3 was 98.8% of the footprint	Clear/aligned indicator	T4 / RQ1-RQ3
028	Clothes will be recyclable by design by 2027	The early target preceded operational criteria and depended on technology and end-of-life infrastructure	Unclear/potential risk	T5 / RQ1-RQ3
036	A fibre claim may apply only to the part containing the qualifying material	The fibre glossary explicitly limits claims for complex products containing trims or non-fabric materials	Clear/aligned indicator	T2 / RQ2-RQ3

Claim ID	Public claim or evidence unit	Documentary qualification retained	Assessment outcome	Theme / RQ
050	Circular-collection items could be recycled at end of life	Removable trims were conditional and collection points were available only in selected markets	Unclear/potential risk	T5 / RQ2-RQ3
055	95% of directly controlled waste was diverted from landfill	The technical definition includes incineration and is limited to controlled operations	Unclear/potential risk	T5 / RQ2-RQ3
056	A live FAQ stated that the Primark Cares range represented 50% of clothing sales	Later dated reports recorded 66% and 74%, creating a version-control inconsistency	Unclear/potential risk	T5 / RQ2-RQ3
058	Primark's scale creates positive impact with every change	Comparable production-volume and total-impact data were not available in the selected evidence	Not assessable	T5 / RQ2-RQ4

Source: Chapter 4 evidence matrix, regulatory lens and negative-case register.

Appendix C - Chapter 5 Discussion and Research-Question Integration

Appendix Table C1: Findings, theory, research questions and managerial control

Accepted finding theme	Primary theoretical interpretation	RQ contribution	Distinct analytical contribution	Managerial control derived
From broad commitments to quantified claim repertoires	Quantification improves signal observability and target accountability	RQ1; RQ2	Precision strengthens evaluability but cannot automatically narrow a broader strategic impression	Define the exact proposition, metric owner, denominator and target status
Evidence is substantive but distributed across document layers	Signal quality depends on receiver accessibility as well as technical strength	RQ2; RQ3	Distinguishes evidence availability from evidence usability	Co-locate material qualification or provide one direct, current evidence route
Circularity and durability are operationalised through bounded standards	Formal standards institutionalise meaning and create repeatable signals	RQ1-RQ3	Treats proprietary standards as useful governance devices with explicit transfer boundaries	Label company-defined criteria and state eligibility, technology and infrastructure limits
Target progress is measurable but sensitive to scope and system conditions	Repeated disclosure supports dynamic legitimacy while incomplete data limit causal interpretation	RQ2; RQ3	Separates transparent target progress from verified target achievement	Retain baseline, scope split, methodology, pathway and progress in a comparable format
Residual risk concentrates in breadth, proximity and version control	Green-claims risk arises from the relationship between claim, evidence and context	RQ2-RQ4	Refines signal quality through proximity, consistency and comparable units	Synchronise living pages, use comparable units and test claim-evidence proximity before release

Source: Chapter 5 findings-to-theory interpretation and objective/RQ matrices.