

SWITCHING OFF GREENWASHING

ANNEX I



BEUC The European
Consumer
Organisation

The Consumer Voice in Europe

June 2026

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BEUC-X-2026-054
June 2026



Co-funded by
the European Union

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Annex I - Accompanying evidence

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ENGIE (France)

On its webpage entitled “How We Act,” ENGIE presents three reasons for consumers to choose the company’s services: “(1) Our solutions for action; (2) our zero-carbon goal; (3) our customers’ reviews”.

ENGIE’s main page¹ advertises its **net zero carbon objectives, installation of renewable energy capacities** and actions to **accelerate the energy transition**. It pledges to achieve “**Net Zero Carbon emissions by 2045**”. It also states “**Our strategy is consistent with a warming well below 2°C**” (with certification from Science Based Targets Certification²). However, this claim is contradicted by the absence of measures to phase out fossil gas at the required pace. Gas is expected to remain part of the company’s operations beyond 2045, weakening its efforts to reduce absolute emissions.³

ENGIE’s net zero target does not account for all the company’s GHG emissions⁴ and was validated by SBTi in 2023 until 2030 (near term target).⁵ ENGIE’s climate strategy lacks medium term targets (for the period 2031-2040), is not accompanied by a transparent investment strategy and a robust and comprehensive transition plan phasing out fossil fuels and developing non-carbon renewable energies at the speed required for the energy transition.⁶

Although consumers may get the impression that the strategy is ambitious, staying *well below 2 degrees* is far from the 1.5° global warming pathway required in the Paris Agreement and the Net Zero Roadmap of the International Energy Agency⁷, which requires decarbonising electricity by 2035 in European and OECD countries, and by 2040 in the rest of the world (earlier than 2045).

ENGIE claims that it aims to “accelerate the energy transition”; however this objective is undermined by substantial delays compared to other European electricity producers in adopting net-zero targets and commitments to phasing out fossil gas, and a by a decarbonisation pathway that is not aligned with the Paris Agreement goals or the IEA Net Zero Roadmap.⁸

¹ <https://particuliers.engie.fr/engie-act.html> (accessed 27/05/2026).

² The SBTi has paused all commitments and validations of targets from the fossil fuel sector ([see what is the SBTi’s policy on fossil fuel companies](#)).

³ [Engie, l’usine à « verdir » le gaz](#).

⁴ It does not include all scope 3 emissions (generally accounting for over 90% of the GHG emission footprint) but only ensures partial coverage of some activities (category 1,2,3,11 and 15 of scope 3)

⁵ [Target dashboard - Science Based Targets Initiative](#).

⁶ [EMBER, Utilities beyond fossil fuels. Evaluating the transition strategies of utility companies – Case study: ENGIE \(EMBER, 2021\); New Climate Institute \(2024\) Corporate Climate Responsibility Monitor; Reclaim Finance \(2025\), ENGIE’s 2025 climate plan: status quo on gas.](#)

⁷ <https://www.iea.org/reports/net-zero-roadmap-a-global-pathway-to-keep-the-15-c-goal-in-reach> (accessed 28/05/2026).

⁸ [Reclaim Finance, Power Transition Tracker, April 2025](#)

Promo Boost parrainage, jusqu'au 31 mai 2026, je parraine, je gagne jusqu'à 105€⁽⁹⁾ J'en profite !

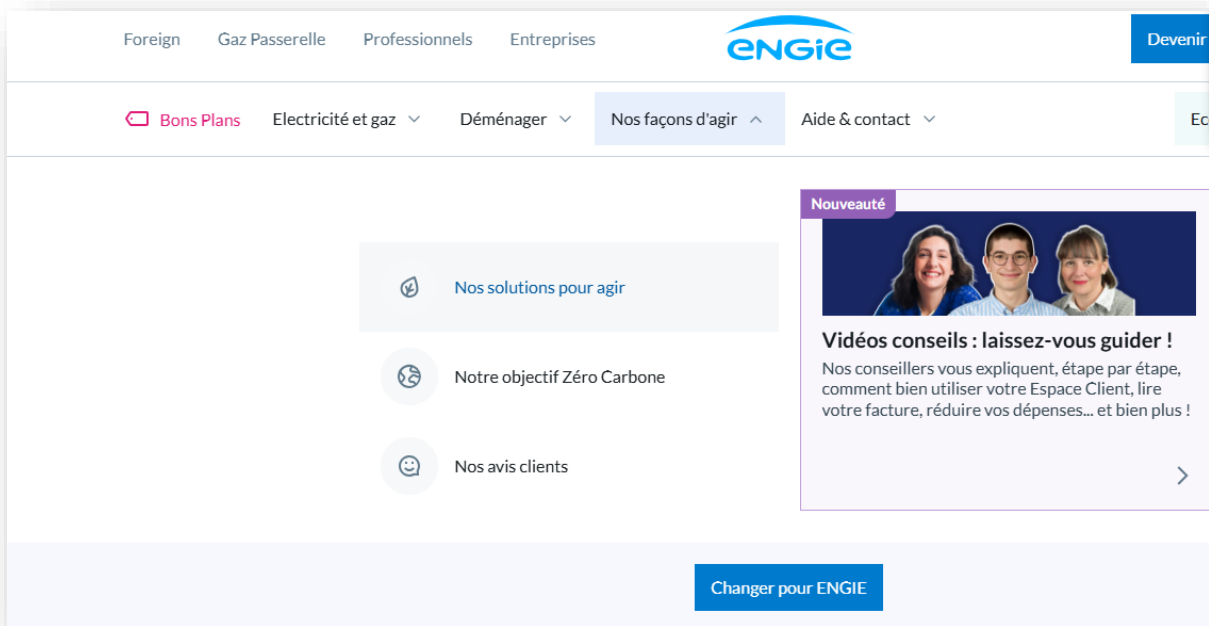


Nos grands engagements

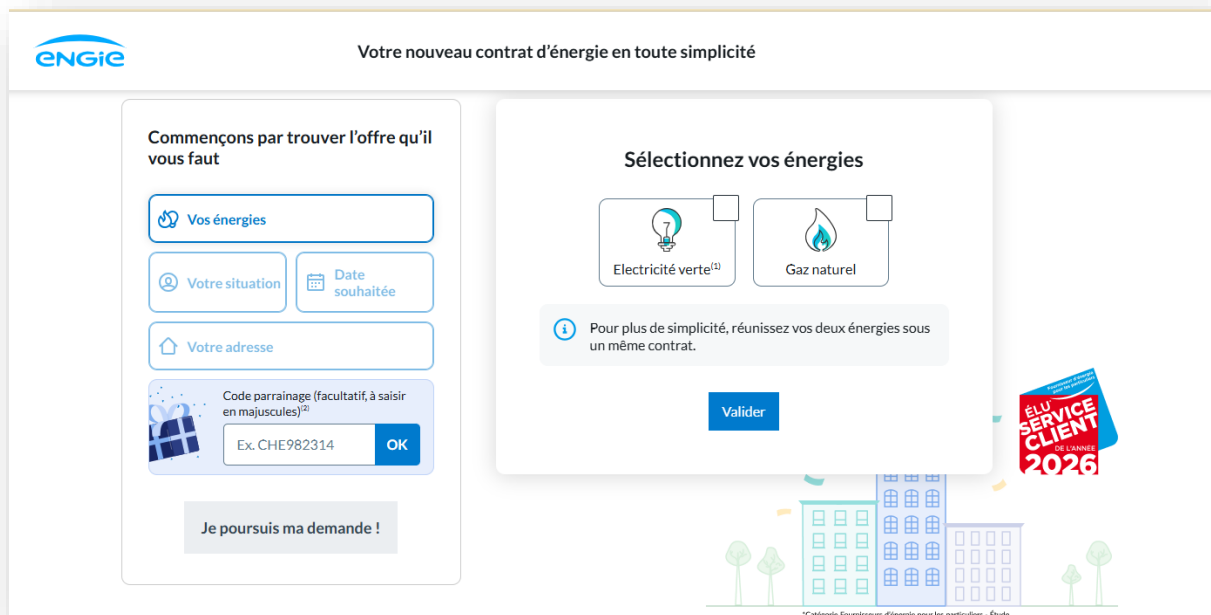
-  Net Zéro Carbone d'ici 2045
-  80GW
de capacités de production électrique installées en renouvelables en 2030
-  2°C
notre stratégie est cohérente avec un réchauffement « bien en-dessous de 2°C » (certification Sciences-Based Targets)

Source: <https://particuliers.engie.fr/engie-act.html> (consulted 18/02/25, 03/04/2025, 14/10/2025; 17/03/2026; 28/04/2026). English text with automatic translation: 'The **ENGIE Group aims for Net Zero Carbon**. Discover the major actions of ENGIE Group on a global scale to **accelerate the energy transition**. Our major commitments: **Net Zero Carbon by 2045; 80GW of electricity production capacity installed in renewables in 2030; our strategy is consistent with a warming "well below 2°C"** (Sciences-Based Targets certification).'

Moreover, the design of ENGIE's website nudges consumers to sign up for a gas contract. In particular, in the section "how we act," the claim "our zero-carbon goal" is accompanied by a box displaying the message "Switching to ENGIE," which redirect consumers to a webpage where they can sign up for a gas contract.



Source: <https://particuliers.engie.fr/engie-act.html> (consulted 18/02/25, 03/04/2025, 14/10/2025; 17/03/2026; 29/04/2026); English text with automatic translation: 'How we act [...] Our Zero Carbon Goal [...] Switching to ENGIE.'



Source: <https://particuliers.engie.fr/engie-act.html> (consulted 18/02/25, 03/04/2025, 14/10/2025; 17/03/2026; 29/04/2026); English text with automatic translation: 'Select your energies [...] natural gas.'

ENGIE further advertises on the same page of its commercial website that it plans to achieve its net Zero Carbon Goal by: developing renewable energy production; gradually replacing natural gas with green gas; reducing the main sources of CO2 emissions.

Comment atteindre notre objectif Net Zéro Carbone ?

1. Développer nos capacités de production en énergies renouvelables

- ✓ 50 GW de capacité renouvelables électriques en 2025
- ✓ 80 GW en 2030

[En savoir plus](#)



2. Remplacer progressivement le gaz naturel par du gaz vert

- ✓ 10 TWh de production de biométhane en 2030
- ✓ 4 GW de production d'hydrogène 2035

[En savoir plus](#)



3. Réduire les principaux postes d'émissions de CO2

- ✓ D'ici 2030, réduire les émissions de CO2 de 95 millions de tonnes via une trajectoire « bien en-dessous de 2°C »
- ✓ D'ici 2045, baisser de 90% (par rapport à 2017) nos émissions de CO2 directes et indirectes

[En savoir plus](#)



Source: <https://particuliers.engie.fr/engie-act.html> (consulted 19/03/2026; 28/05/2026). English text with automatic translation: How do we achieve our Net Zero Carbon goal? '1. Developing our renewable energy production capacities [...]; 2. Gradually replace natural gas with green gas [...]; 3. Reducing the main CO2 emissions [...].

When making these claims ENGIE focuses on **limited sustainability aspects of the company's activities**, particularly on the development of renewable energy. These actions are presented as “major” actions on a global level to “**accelerate the energy transition**”. While these developments are a positive move forward, their impact is limited when the company's overall strategy continues to depend heavily on high-emission sources such as fossil gas. ENGIE ranks among the world's largest electricity

producers, with more than 100GW of installed generation capacity, almost half of which is derived from fossil gas power plants⁹.

When making these environmental claims ENGIE **omits providing information about the relative share that these activities represent compared to the production, distribution and sales of natural gas** by the company which causes a highly negative impact on the environment. The share of fossil gas in ENGIE's energy mix (installed capacities) represented 49.2% in 2023.¹⁰

In addition, ENGIE's claims about the *Green Gas + package* can give the impression to consumers that the product contributes to reducing CO2 emissions, while the company fails to inform consumers that fossil gas, which remains an important component of the product, is highly polluting and responsible for substantial amounts of CO2 emissions.

The screenshot shows a webpage for 'Option Gaz vert+' by ENGIE. The header includes the text 'ENGIE 1er fournisseur d'électricité verte et gaz naturel' and 'Option Gaz Vert+'. The main heading is 'Option Gaz vert+ : ENGIE votre fournisseur de gaz vert français'. A central white box contains the text: 'Un objectif commun : favoriser le développement des énergies renouvelables en France' and 'À partir de 0,75€^{TTC} / mois', with a blue 'Je souscris' button below. Below this, there are three icons with labels: 'Gaz renouvelable' (leaf icon), 'Production française' (map of France icon), and 'Zéro engagement' (lock icon). A text block states 'Soutenez la filière des sites de production exclusivement installés en France'. At the bottom, there is a call to action: 'Rappel gratuit et immédiat par un conseiller options vertes' with a 'Renseigner mon numéro' button.

Source: <https://particuliers.engie.fr/electricite-gaz/options-gaz-vert-plus.html> (consulted 27/04/2026); English text with automatic translation: '**Green Gas Option+**: ENGIE your French green gas supplier. A common objective: to promote the development of renewable energies in France. **From 0.75€/month**. I subscribe. Support the supply chain of production sites exclusively located in France. Renewable gas. French production. [...] **Renewable gas** [...]'

⁹ [Utilities Beyond Fossil Fuels | Ember](#)

¹⁰ https://reclaimfinance.org/site/wp-content/uploads/2025/04/2025.04.16_Reclaim-Finance_ENGIEs-climate-plan-2025.pdf

Agissez avec ENGIE

Les effets positifs de Gaz Vert+ :

En 2024, grâce à vous et à l'ensemble des clients Gaz vert+, nous avons évité l'émission de **15 600 tonnes de CO2(e)**, soit l'équivalent de presque 100 000 aller-retours Paris-New York en avion.

[En savoir plus](#)



Source: <https://particuliers.engie.fr/electricite-gaz/options-gaz-vert-plus.html> (consulted 27/04/2026); English text with automatic translation: *'The positive effects of Gaz Vert+: In 2024, thanks to you and all Gaz vert+ customers, we have avoided the emission of 15,600 tonnes of CO2(e), the equivalent of almost 100,000 round trips from Paris to New York by plane.'*

L'option Gaz Vert+ ⁽¹⁾



Avec cette option, ENGIE vous garantit que **le pourcentage de gaz sélectionné correspond à une quantité de biométhane effectivement produite et injectée sur le réseau.**

Sachez que vous aurez la possibilité de faire varier ce pourcentage à votre convenance via un conseiller en choisissant la part de votre gaz vert que vous souhaitez qu'ENGIE achète : de 5% (0,75€ TTC par mois) pour un coup de pouce à la filière jusqu'à 100% (15€ TTC par mois) pour un soutien total à la production française de gaz d'origine renouvelable. Au travers d'un forfait simple, transparent et d'un engagement maîtrisé, **vous soutenez la filière.**

[Je souscris](#)

Source: <https://particuliers.engie.fr/electricite-gaz/options-gaz-vert-plus.html> (consulted 27/04/2026); English text with automatic translation: *'With this option, ENGIE guarantees that the percentage of gas selected corresponds to the quantity of biomethane actually produced and injected into the network. You will be able to vary this percentage at your convenience via an advisor by choosing the share of your green gas that you want ENGIE to buy: from 5% (€0.75 incl. VAT per month) for a boost to the sector up to 100% (€15 incl. VAT per month) for total support for French production of gas from renewable sources. Through a simple, transparent package and a controlled commitment, you support the sector.'*

ENGIE (Belgium)

On its homepage,¹¹ ENGIE claims that the company wants to lead the energy transition, based on four key pillars: (1) “commitment to achieve net zero carbon emissions by 2045, (2) green electricity production in Belgium of 720 MW; (3) investments in technologies to meet fluctuations in energy demand and (4) its support so that customers can achieve their sustainability goals”.

When consumers click on the available link with “solutions to clients” providing more details for how ENGIE supports clients in achieving their sustainability goals, they land on the corporate page¹² which displays the following claim: “ENGIE is positioned as world leader of the energy transition and offers a wide range of innovative energy solutions for individuals and businesses”; “At ENGIE, we are committed to helping customers achieve their sustainability goals while providing them with efficient and sustainable energy solutions”; A banner follows with the claim “Our ambition is to support customers in their transition to zero carbon” – next to the link “Explore our customer solutions”, which directs consumers again back to the commercial website where they can sign up for an energy package for fossil gas and/or electricity and fossil gas.

Through the four consecutive clicks described below,¹³ consumers interested in sustainable solutions and the transition to zero carbon are encouraged to sign up for an electricity and gas or gas-only package. This can be misleading because ENGIE does not substantiate how this choice supports customers in achieving their sustainability objectives and the transition to zero carbon. Instead, it nudges consumers to sign up for a fossil gas contract, potentially creating the false impression that it is a sustainable energy solution.

(1)

Que fait ENGIE pour la transition énergétique ?

ENGIE veut prendre la tête de la transition. C'est pourquoi ENGIE construit en Belgique, avec ses 7 000 employés, le système énergétique bas carbone de demain pour une transition énergétique abordable, fiable et durable pour tous ses clients.

 <p>ENGIE s'engage à atteindre le Net Zéro Carbone d'ici 2045.</p> <p>Notre ambition</p>	 <p>ENGIE a une production d'électricité verte en Belgique de 720 MW.</p> <p>Energies renouvelables</p>	 <p>ENGIE s'investit dans les technologies permettant de répondre aux fluctuations de la demande en énergie.</p> <p>Production flexible</p>	 <p>ENGIE aide ses clients à atteindre leurs objectifs de développement durable.</p> <p>Solutions clients</p>
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Source: <https://www.engie.be/fr/transition-energetique/> (consulted 20/03/2025 ; 18/03/2026; 27/04/2026). English text with automatic translation: ‘**ENGIE its committed to achieving Net Zero Carbon by 2045 [...] ENGIE helps its customers achieve their sustainability goals. Customer Solutions.**’

¹¹ <https://www.engie.be/fr/transition-energetique/> (last accessed on 26/05/2026).

¹² <https://corporate.engie.be/fr/solutions-clients> (last accessed on 26/05/2026).

¹³ (1) <https://www.engie.be/fr/transition-energetique/> → (2) <https://corporate.engie.be/fr/solutions-clients> → (3) <https://www.engie.be/fr/> → (4) <https://www.engie.be/fr/contrat/simulation/?scenario=1&postalCode=1170#/choix-type-energie> (consulted 20/03/2025 ; 18/03/2026 ; 27/04/2026 ; last accessed 26/05/2026).

(2)

Solutions clients

ENGIE se positionne comme un leader mondial de la transition énergétique et propose une large gamme de solutions énergétiques innovantes pour les particuliers et les entreprises.

Notre ambition est d'accompagner nos clients dans leur transition vers le zéro carbone

Découvrir nos solutions clients

Source: <https://corporate.engie.be/fr/solutions-clients> accessible through the commercial website <https://www.engie.be/fr/transition-energetique/> (consulted 20/03/2025 ; 18/03/2026 ; 27/04/2026). English text with automatic translation: **'Customer solutions. ENGIE is positioned as a world leader in the energy transition and offers a wide range of innovative solutions for individuals and businesses. [...] Our ambition is to support our customers in their transition to zero carbon: explore our customer solutions.'**

(3)

Particuliers Professionnels Grandes entreprises

ENGIE

Déménager Aide & Contact FR NL DE

Devenir client Électricité et gaz Services et équipements Consommation intelligente Outils & Avantages Les sujets du moment Mon espace client

Ça fait du bien d'être sûr.

Plus d'info

Calculez votre prix de l'énergie

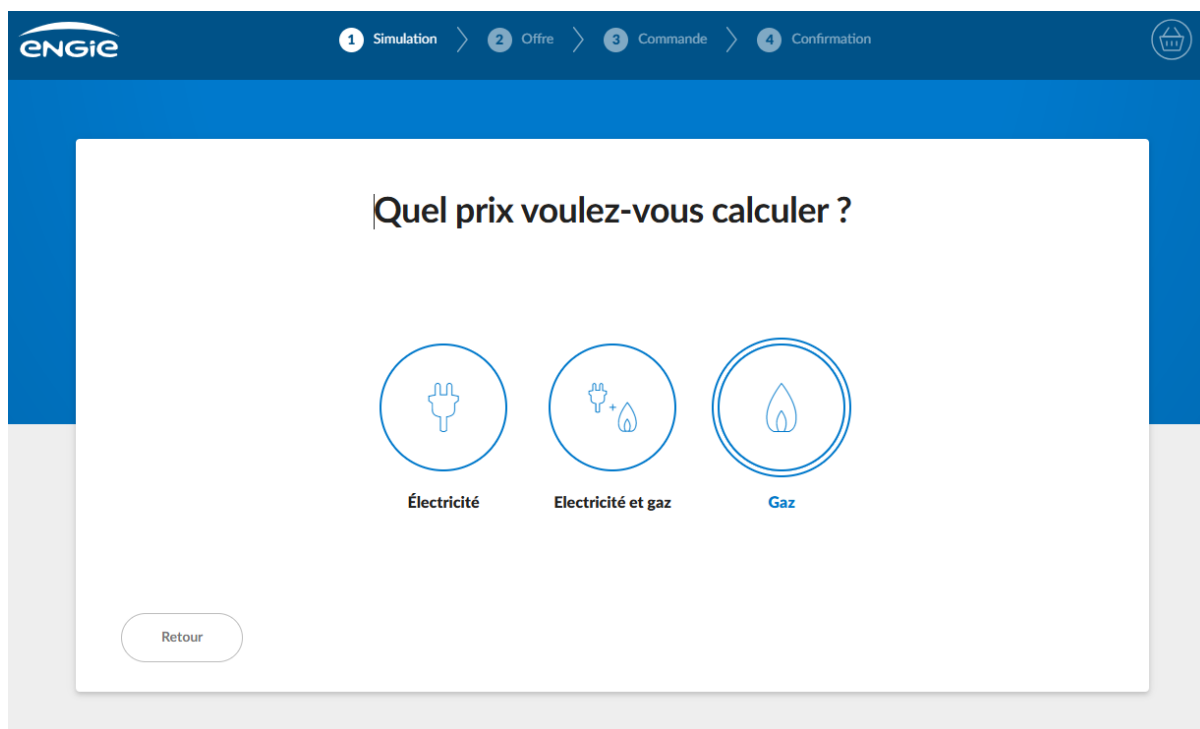
CALCULEZ VOTRE PRIX

Code postal

Calculez

Source: <https://www.engie.be/fr/> (consulted 20/03/2025 ; 18/03/2026 ; 27/04/2026 ; 26/05/2026). English text with automatic translation: **'Calculate your energy price.'**

(4)



Source: <https://www.engie.be/fr/contrat/simulation/?scenario=1&postalCode=1170#/client> (consulted 20/03/2025; 18/03/2026; 27/04/2026; 26/05/2026). English text with automatic translation: 'What price do you want to calculate? Electricity; Electricity and gas.'

In addition, ENGIE makes an environmental claim based on limited sustainability aspects when claiming that its energy package “contract EASY” allows consumers to choose 100% green energy. ENGIE proposes this contract as one of the actions that consumers can take to contribute to the energy transition. While ENGIE explains that the contract offers 100% green electricity, it omits informing consumers that the package includes natural gas which has a highly negative impact on the environment.

Comment puis-je contribuer à la **transition énergétique** ?

Chacun d'entre nous est concerné par la transition énergétique. Lutter seul contre le changement climatique peut paraître une cause perdue mais il n'en est rien. Chaque geste, chaque personne compte. Chacun a la possibilité de contribuer à la transition énergétique à sa propre échelle : en réduisant sa consommation énergétique, en choisissant le bon contrat ou encore en investissant dans des solutions vertes.

Choisir une énergie 100% verte et réduire son empreinte carbone ?

Il suffit de souscrire notre contrat EASY qui vous offre une électricité 100% verte. Vous préférez ne pas changer de contrat mais quand même opter pour de l'électricité verte ? Pas de souci, vous pouvez souscrire notre option 100% verte quel que soit votre contrat.

Source: <https://www.engie.be/fr/transition-energetique/> (consulted 18/03/2026 ; 27/04/2026 ; 27/05/2026). English text with automatic translation: *'How can I contribute to the energy transition? (...) Choosing 100% green energy and reducing its carbon footprint? All you have to do is subscribe to our EASY contract which offers 100% green electricity. You would rather not change your contract but still opt for green electricity? No problem, you can subscribe to our 100% green option whatever your contract.'*

ENGIE (The Netherlands)

ENGIE

Energie Product en advies Verduurzamen

Direct naar

Over ons Nieuws & Kennisbank Projecten Pers

Nul CO2 uitstoot is de ambitie

ENGIE heeft de ambitie om in 2045 volledig CO2-neutraal zijn. We gaan ervoor om een "Zero Carbon Champion" te worden. Onderweg zorgen we voor een betrouwbare en betaalbare energievoorziening. En helpen we klanten om energie te besparen en te verduurzamen. Zo maken we samen heel Nederland duurzaam. Hoe we dat doen en welke stappen we zetten, bekijk je in onze interactieve infographic, met uitleg en video's.

Bekijk de Infographic

Source: <https://www.engie.nl/over-ons> (consulted 20/03/2025; 26/05/2026). English text with automatic translation: *'A sustainable alternative to natural gas. Green Gas. With the production of green gas, ENGIE is helping households, transport and industry to become CO2 neutral. We do this in many places in Europe - including here in the Netherlands.'*

ENGIE makes environmental claims based on limited sustainability aspects, when showing that its sustainability commitment is based on the development of green gas, battery storage, wind energy and solar energy. The company omits to inform consumers about the relative share that these activities represent in the overall activities of the company which are highly dependent on sales of fossil gas.

Onze duurzame inzet



Groen gas

Groen gas is een belangrijke energiedrager voor een duurzaam energiesysteem in Nederland in 2050.

[Lees verder](#)



Batterijopslag

Batterij-energieopslagsystemen (BESS) worden een belangrijk onderdeel van ons energiesysteem.

[Lees verder](#)



Windenergie

Wind is een schone, krachtige natuurlijke bron die nooit opdraakt. Lees meer over onze projecten.

[Lees meer](#)



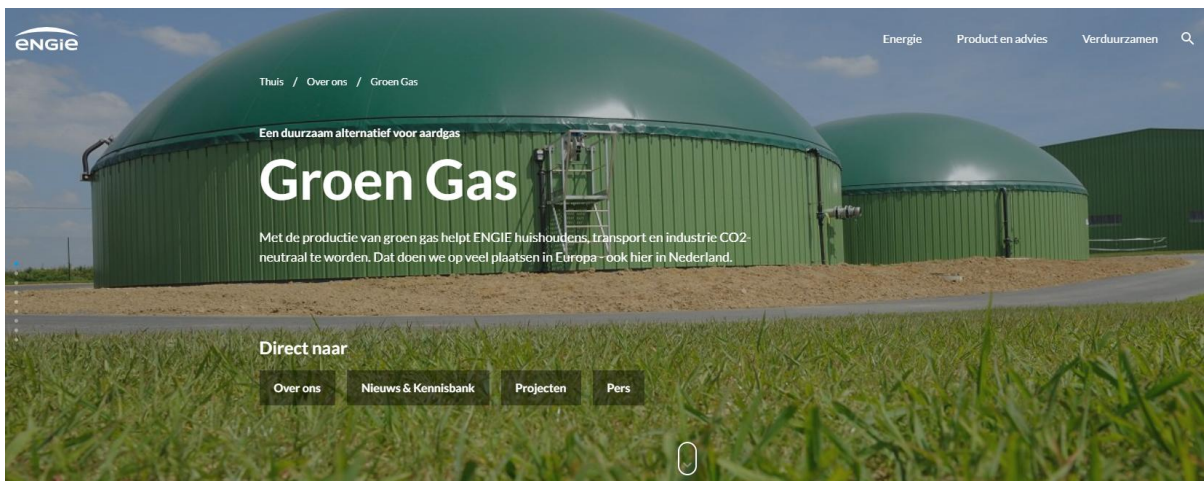
Zonne-energie

De zon is een onbeperkte energiebron die ENGIE inzet via verschillende systemen.

[Lees meer](#)

Source: <https://www.engie.nl/over-ons> (consulted 18/03/2026; 27/04/2026). English text with automatic translation: ‘**Our sustainability commitment; Green gas** – Green gas is an important energy carrier for a sustainable energy system in the Netherlands in 2050; **Battery storage** – Battery storage systems are becoming an important part of our energy system; **Wind energy** – wind is clean, powerful natural resource that never runs out; **Solar energy** – the sun is unlimited source of energy that ENGIE uses through various systems.’

ENGIE presents green gas as “a sustainable alternative to natural gas,” which the company offers to help households, transport and industry become climate neutral.



Source: <https://www.engie.nl/over-ons/groen-gas> (consulted 18/03/2026, 27/04/2026). English text with automatic translation: ‘**A sustainable alternative to natural gas. Green Gas. With the production of green gas, ENGIE is helping households, transport and industry to become CO2 neutral. We do this in many places in Europe - including here in the Netherlands.**’

ENGIE conveys the false impression that the company will replace natural gas on a one-to-one basis in the “foreseeable” future, making a vague claim regarding how the company plans to achieve “feasible” large-scale production.

De voordelen van groen gas

Groen gas kan aardgas één op één vervangen. Hierdoor zijn bijvoorbeeld geen extra aanpassingen nodig in huishoudens – de aansluiting en gasmeter blijven ongewijzigd. Er zijn echter meer redenen waarom groen gas een uitstekend alternatief voor aardgas is.



Veilig

De grootschalige productie van groen gas is veilig en gebeurt met moderne technieken.



Circulair

Groen gas wordt gemaakt van biologische reststromen en ook de reststoffen na gasproductie kunnen worden hergebruikt.



Haalbaar

Grootschalige productie van groen gas is binnen afzienbare termijn haalbaar.

Source: <https://www.engie.nl/over-ons/groen-gas> (consulted 18/03/2026; 27/04/2026; 27/05/2026). English text with automatic translation: *‘The benefits of green gas. Green gas can replace natural gas on a one-to-one basis. As a result, for example, no additional adjustments are needed in households. However, there are more reasons why green gas is an excellent alternative to natural gas. ...] ✓ Feasible Large-scale production of green gas is feasible in the foreseeable future.’*

ENGIE sells an energy package which contains fossil gas under the claim “**Sustainable energy from ENGIE**”. The package includes a standard “**100% green electricity and Mixed with green gas**”. It claims towards the consumer that, “**With Dutch Green electricity and Mixed with green gas you make an economical and sustainable choice**”. The fact that green gas is mixed with fossil gas implies that the energy package has a highly negative impact on the environment and therefore qualifying this energy package with the claim “sustainable energy” is misleading for consumers.

Duurzame energie van ENGIE


Ben je van plan om over te stappen naar duurzame energie? Dan ben je bij ENGIE aan het juiste adres. We helpen je graag om te verduurzamen en te besparen.

- Voordelige energieprijzen.
- Standaard 100% groene stroom en [Mix met groen gas](#)
- Gratis slimme meter app waarmee je kunt besparen op je energieverbruik.
- Een eigen persoonlijke omgeving om goed overzicht te houden.
- Hulp bij het verduurzamen van je huis via persoonlijk advies of een energiescan.

[Bereken direct je maandbedrag](#)

Source: <https://www.engie.nl/verduurzamen/duurzame-energiebronnen> (consulted 18/03/2026; 27/04/2026); English text with automatic translation: *'Sustainable energy from ENGIE. Are you planning to switch to sustainable energy? Then you've come to the right place at ENGIE. We are happy to help you become more sustainable and save. [...] Standard 100% green electricity and Mix with green gas [...].'*


Energie voor thuis



Voordelige energie

Met Nederlandse groene stroom en Mix met groen gas maak je een voordelige en duurzame keuze.


[Bereken je maandbedrag >](#)



Gratis energie-app

Met onze gratis energie-app heb je altijd grip op je energieverbruik en regel je eenvoudig je energiezaken. Ook als je geen klant bent.

[Download nu >](#)



Zonnepanelen

Met zonnepanelen op je dak wek je je eigen groene stroom op. En je bespaart ook nog eens flink op je energierekening.

[Doe de dakscan >](#)

Source: <https://www.engie.nl/product-advies> (consulted 18/03/2026; 26/05/2026) English text with automatic translation: *'Energy for the home. Economical energy. With Dutch green electricity and Mix with green gas, you make an economical and sustainable choice.'*

ENGIE claims that the company compensates CO₂ emissions of all customers' gas consumption as standard, giving the impression that the total CO₂ emissions of gas consumption is zero. It also states that due to "new insights" ENGIE has decided from December 2024 to offer for new permanent contracts a standard 'Mix with green gas'. For customers with a model contract, it will continue to compensate the CO₂ emissions of gas consumption "for the time being". "To this end, we invest on behalf of our customers in projects that compensate for the emissions of gas consumption". ENGIE gives the impression that the total CO₂ emissions of gas consumption are neutralised.

CO2-gecompenseerd gas

Direct naar

Vast

Variabel

Dynamisch

Hybride

Groene stroom

Mix met groen gas

Voor veel Nederlanders is het nog niet mogelijk om gasloos te wonen. Daarom compenseert ENGIE sinds 2019 standaard de CO2-uitstoot van het gasverbruik van alle klanten.

Dankzij nieuwe inzichten heeft de ENGIE Groep in 2024 besloten om over te stappen op een mix van groen en fossiel gas. Vanaf december 2024 ontvangen nieuwe klanten en bestaande klanten met een nieuw vast contract daarom standaard [Mix met groen gas](#). Voor klanten met een modelcontract blijven wij voorlopig de CO2-uitstoot van het gasverbruik compenseren. Hiervoor investeren wij namens onze klanten in projecten die de uitstoot van het gasverbruik compenseren.

Source: <https://www.engie.nl/energie/co2-gecompenseerd-gas> (consulted 21/03/2025; 18/03/2026). English text with automatic translation: 'For many Dutch people, it is not yet possible to live gas-free. That is why, **since 2019, ENGIE has been compensating the CO2 emissions of all customers' gas consumption as standard. Thanks to new insights, the ENGIE Group decided in 2024 to switch to a mix of green and fossil gas. From December 2024, new customers and existing customers with a new permanent contract will therefore receive a standard Mix with green gas. For customers with a model contract, we will continue to compensate the CO2 emissions of gas consumption for the time being. To this end, we invest on behalf of our customers in projects that compensate for the emissions of gas consumption.**'

ENGIE (Italy)

Perché scegliere ENGIE?



Consumi intelligenti per un futuro sostenibile

La vera eccellenza risiede nella capacità di ottimizzare ogni risorsa. In ENGIE, ti offriamo gli strumenti per una gestione consapevole della tua casa elettrificata, permettendoti di monitorare i consumi con la nostra App e ridurre gli sprechi senza compromettere il tuo comfort. Scegliere l'energia pulita da fonti rinnovabili significa investire in un impatto ambientale positivo attraverso l'efficienza e il controllo tecnologico.

Source: <https://www.engie.it/casa/offerte-luce-gas/energia-puntofisso-24mesi/> (consulted 19/03/2026; 27/04/2026). English text with automatic translation: **'Smart consumption for a sustainable future. True excellence lies in the ability to optimize every resource. At ENGIE, we offer you the tools for a conscious management of your electrified home [...] Choosing clean energy from renewable sources means investing in a positive environmental impact through efficiency and technological control.'**

ENGIE claims to work to make sustainability an Italian “excellence,” accelerating the energy transition, accompanying consumers in Italy to consume less and better with electricity and gas solutions. The offer of fossil gas, a highly polluting fossil-fuel product, is part of the mix of solutions upon which ENGIE relies to achieve ‘sustainability excellence and the energy transition, as well as support customers on decarbonising their journey’.

Siamo ENGIE

Con le nostre 3.200 persone e oltre 60 sedi su tutto il territorio italiano ci impegniamo ogni giorno per accelerare la Transizione Energetica e accompagnare oltre 1 milione di clienti in un percorso per consumare meno e meglio con soluzioni per Luce e Gas più adatte alle loro esigenze.

Solo insieme possiamo rendere la sostenibilità un'eccellenza italiana.



Source: <https://www.engie.it/casa/offerte-luce-gas/energia-puntofisso-24mesi/> (consulted 19/03/2026; 27/04/2026); English text with automatic translation: 'We are ENGIE. With our 3,200 people and over 60 offices throughout Italy, we are committed every day to **accelerating the Energy Transition** and accompanying over 1 million customers on a path **to consume less and better with electricity and gas solutions** that are better suited to their needs. **Only together can we make sustainability an Italian excellence.**'

🏠 > Il nostro impegno > ENGIE Educational > Carbon footprint

Carbon Footprint

Il nostro impegno per un minore impatto ambientale

Consumando energia meno e meglio e affiancando i nostri clienti nel loro percorso di decarbonizzazione contribuiamo a rendere la sostenibilità un'eccellenza italiana



Source: <https://www.engie.it/il-nostro-impegno/engie-educational/engie-carbon-footprint/> (consulted 19/03/2026; 27/04/2026; 28/05/2026). English text with automatic translation: '**Carbon Footprint. Our commitment to a lower environmental impact. By consuming less and better energy and supporting our customers on their decarbonisation journey, we contribute to making sustainability and Italian excellence.**'

Moreover, ENGIE also markets in Italy an electricity and gas package under the headline of “Green Energy”.

E in più, sempre inclusi nella tua offerta:

- La comodità del digitale**
Paghi con addebito diretto su conto corrente e ricevi la bolletta online. Niente carta, niente code, niente pensieri.
- Energia Verde senza costi extra**
Con ENGIE l'energia elettrica proviene al 100% da fonti rinnovabili. Fa bene a te, e ancora di più al pianeta.
- Supporto per ogni esigenza**
Parlare con qualcuno che ti ascolta davvero e sa darti le risposte giuste fa la differenza. E quando ne avrai bisogno, il nostro servizio clienti sarà lì per te. Lo dimostra chi ci ha già scelto: 9 clienti su 10 sono soddisfatti.
- Monitoraggio consumi**
Scopri quanto consumi, quando e come. Monitora luce e gas, guarda lo storico fino a 2 anni e trova i momenti in cui consumi di più. Per scegliere in modo consapevole, ogni giorno.
- La nostra App**
Con l'app ENGIE Italia puoi gestire ogni aspetto del tuo contratto, controllare le bollette e parlare con noi. Senza attese, senza stress.

Energia PuntoFisso 12 Mesi
Offerta valida fino al 27/05/2026

Luce Monorario A fasce

Corrispettivo annuo	72 €/anno
Corrispettivo per il consumo <small>perdite di rete incluse</small>	0,1168 €/kWh

Gas

Corrispettivo annuo	84 €/anno
Corrispettivo per il consumo ⁽¹⁾	0,483 €/Smc

Altri costi indipendenti da ENGIE: Dispacciamento (solo Luce), Tariffa per l'uso della rete e Oneri generali di sistema (Luce e Gas)

[Simula la tua bolletta](#)

Avvia la configurazione

Source: <https://www.engie.it/casa/offerte-luce-gas/energia-puntofisso-12mesi/> (consulted 19/03/2026; 27/04/2026); English text with automatic translation: 'And what's more, always included in your offer: [...] ✓Green Energy at no extra cost. With ENGIE, 100% electricity comes from renewable sources. It's good for you and even more for the planet.'

TOTAL ENERGIES

TotalEnergies (France)

TotalEnergies France includes in the homepage of its **commercial website**¹⁴ the section “**Discover Us.**”¹⁵ In this sector the statement “**discover our ambition for a better energy**” contains a hyperlink¹⁶ that directs consumers to the corporate website where the company displays environmental claims about its climate ambitions. Thus, there is a strong link between the commercial website and the corporate website including the future environmental performance claims of the company.

In that way, TotalEnergies advertises to consumers its ambition to achieve climate neutrality by 2050, together with society. A claim which has been found misleading by the French Court.¹⁷

TotalEnergies’ climate strategy is not aligned with the objectives of the Paris Agreement. The company continues to invest heavily in fossil fuels, with oil and gas extraction and liquified natural gas remaining at the core of its business. By contrast, diversification into other energy sources will keep representing a minor share of their future production. By 2030, the company’s energy mix is projected to consist approximately of 8% renewables, compared to 83% of oil and gas.¹⁸

In March 2026, TotalEnergies announced publicly¹⁹ that its objective of achieving climate neutrality by 2050 excludes so-called Scope 3 emissions.²⁰ These emissions account for more than 80% of greenhouse gas emissions in the oil and gas sector. Presenting itself to consumers as aiming for climate neutrality while excluding emissions resulting from the use of the products it sells is misleading, as these emissions contribute the vast majority of the company’s overall carbon footprint.

¹⁴ <https://www.totalenergies.fr/> (accessed on 27/04/2026)

¹⁵ <https://www.totalenergies.fr/nous-decouvrir> (accessed on 27/04/2026).

¹⁶ <https://totalenergies.com/fr/compagnie/ambition> (accessed on 27/04/2026)

¹⁷ Tribunal judiciaire de Paris 23 October 2025, *TotalEnergies*, RG n° 22/02955

¹⁸ *Assessment of oil and gas companies' climate strategy - Reclaim Finance*

¹⁹ https://totalenergies.com/system/files/documents/totalenergies_sustainability-climate-2026-progress-report_2026_fr.pdf#page=22 (accessed on 27/05/2026).

²⁰ *Face à une transition énergétique qui patine, TotalEnergies revient sur son objectif de neutralité carbone en 2050 - Les Echos*



L'ambition de TotalEnergies en matière de développement durable et de transition énergétique vers la neutralité carbone, ensemble avec la société

TotalEnergies réaffirme son ambition d'atteindre la neutralité carbone, ensemble avec la société, au service de laquelle elle poursuit, avec constance, sa stratégie de transition équilibrée et créatrice de valeur, fondée sur deux piliers : *Oil & Gas* et *Integrated Power*.

Source: <https://totalenergies.com/fr/compagnie/demarche> accessible through commercial website <https://www.totalenergies.fr/nous-decouvrir> (consulted 27/05/2026). English text with automatic translation: **'TotalEnergies' ambition in terms of sustainable development and energy transition towards carbon neutrality, together with society. TotalEnergies reaffirms its ambition to achieve carbon neutrality, together with society, in which it consistently pursues its strategy of balanced and value-creating transition, based on two pillars: Oil & Gas and Integrated Power.'**

Une stratégie de transition au service de l'ambition

Dans le cadre de cette ambition, la Compagnie a défini et mis en œuvre de manière constante une stratégie de transition équilibrée reposant sur deux piliers :

- Un pilier *Oil & Gas*, axé sur des projets à faibles coûts et à faibles émissions.
- Un pilier *Integrated Power*, constitué d'actifs renouvelables et flexibles afin de fournir à ses clients de l'électricité bas carbone et disponible.

Cette stratégie soutient notre ambition de neutralité carbone, ensemble avec la société, dans le cadre défini par les objectifs de l'Accord de Paris.

► **En savoir plus sur notre stratégie**

Source: <https://totalenergies.com/fr/compagnie/demarche> accessible through commercial website <https://www.totalenergies.fr/nous-decouvrir> (consulted 27/05/2026). English text with automatic translation: **'A transition strategy at the service of ambition. As part of this ambition, the Company has consistently defined and implemented a balanced transition strategy based on two pillars: ✓ An Oil & Gas pillar, focused on low-cost, low-emission projects. ✓ An Integrated Power pillar, made up of renewable and flexible assets to provide its customers with low-carbon and available electricity. This strategy supports our ambition to achieve carbon neutrality, together with society, within the framework defined by the goals of the Paris Agreement.'**

Les chemins vers cette ambition seront réévalués et adaptés

Nous reconnaissons que notre capacité à atteindre la neutralité carbone est liée à nos propres efforts de décarbonation et aux progrès plus larges de la société dans ce domaine.

Par conséquent :

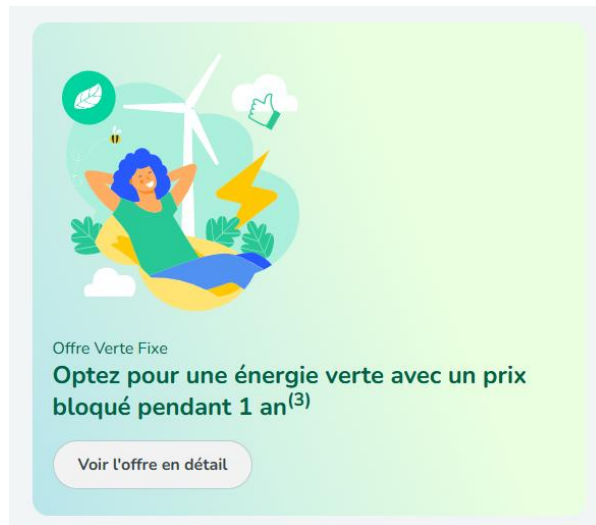
- TotalEnergies vise à atteindre la neutralité carbone pour ses émissions mondiales liées à ses activités (Scope 1+2) d'ici 2050 ;
- TotalEnergies travaille proactivement avec ses clients pour les aider à mettre en œuvre leurs propres stratégies de transition énergétique et met sur le marché un mix énergétique présentant une intensité carbone de plus en plus faible d'année en année.

La capacité de TotalEnergies à y parvenir dépend notamment du rythme des innovations techniques pour fournir des énergies bas carbone abordables, des politiques publiques et du comportement des consommateurs. C'est ce que recouvre l'expression « ensemble avec la société ». **En raison de ces dépendances, les chemins vers notre ambition de neutralité carbone auront besoin d'être réévalués et adaptés au fil du temps.**

Source: <https://totalenergies.com/fr/compagnie/demarche> accessible through commercial website <https://www.totalenergies.fr/nous-decouvrir> (consulted 27/05/2026). English text with automatic translation: *'The paths towards this ambition will be reassessed and adapted. We recognise that our ability to achieve carbon neutrality is linked to our own decarbonisation efforts and society's wider progress in this area. Therefore: ✓ TotalEnergies aims to achieve carbon neutrality for its global emissions related to its activities (Scope 1+2) by 2050; ✓ TotalEnergies is proactively working with its customers to help them implement their own energy transition strategies and is bringing to market an energy mix with an increasingly low carbon intensity year after year. TotalEnergies' ability to achieve this depends in particular on the pace of technical innovations to provide affordable low-carbon energy, public policies and consumer behaviour. This is what the expression "together with society" covers. Because of these dependencies, the paths to our net-zero ambition will need to be reassessed and adapted over time.'*

TotalEnergies also advertises a “Green Fixed Gas” tariff which together with the use of green imagery gives the impression to the consumer that this is a product with an environmental positive impact for the environment or a sustainable choice. However, the package contains 90% of fossil gas which has a very high negative impact on the environment.

Moreover, while TotalEnergies with this claim can give the impression to consumers that the gas comes directly from biomethane farms, in a small footprint note accessible at the end of the page, it explains that “*TotalEnergies purchases a guarantee of origin issued by French producers for each MWh (1000 kWh) of biogas consumed, guaranteeing the injection of an equivalent biogas production into the grid*”.



Source: <https://www.totalenergies.fr/particuliers/electricite-et-gaz/offres-d-electricite-et-gaz> (consulted 19/03/2026; 27/04/2026). English text with automatic translation: *'Fixed Green Offer. Opt for green energy with a price locked in for 1 year. See the offer in detail.'*

Conditions des offres et autres informations

⁽¹⁾ Prix du kWh HT et de l'abonnement HT fixe sur 1 an. [Voir grille tarifaire.](#)

⁽²⁾ TotalEnergies achète une garantie d'origine émise par des producteurs français pour chaque MWh (1000 kWh) de biogaz consommé, garantissant l'injection sur le réseau d'une production équivalente de biogaz.

⁽³⁾ Sous réserve d'être client TotalEnergies depuis au moins 1 an.

Source: <https://www.totalenergies.fr/particuliers/gaz/offres-de-gaz/offre-verte-fixe-gaz> (consulted 18/03/2026 ; 27/04/2026). English text with automatic translation: *'Green Fixed Gas. A 1-year lock-in price¹ and 10% French biogas (green gas)². Biogas directly from the biomethane farms of our French partner producers² [...]. (Footnote at the bottom of the webpage): ⁽²⁾ TotalEnergies purchases a guarantee of origin issued by French producers for each MWh (1000 kWh) of biogas consumed, guaranteeing the injection of an equivalent biogas production into the grid.'*

TotalEnergies (Germany)

TotalEnergies Germany offers heating services (oil and biomass) for private customers. In the section “**About Us**”²¹ of its commercial website, the company makes claims on future environmental performance, concretely in relation to its ambition to become CO₂ neutral by 2050. The use of offsetting is not communicated together with the claim, although the company explains on another page²² that it plans to use carbon credits.

TotalEnergies als Multi-Energie-Unternehmen: Unsere Ambitionen

TotalEnergies stellt sich den Herausforderungen des Klimawandels. Als globales Multi-Energie-Unternehmen setzen wir unseren Kurs in der Energiewende fort – mit dem Ziel der CO₂-Neutralität bis 2050, gemeinsam mit der Gesellschaft. Schritt für Schritt.

Unser Weg gemeinsam mit der Gesellschaft zur CO₂-Neutralität

Um die Ziele des Pariser Abkommens zu unterstützen, die globale Durchschnittstemperatur auf möglichst unter 2 °C zu begrenzen, transformieren wir unser gesamtes Unternehmen. Unsere Strategie umfasst dabei alle Emissionen von der Herstellung bis zur Nutzung der verkauften Energieprodukte durch unsere Kunden (Scopes 1, 2 und 3). Zur schrittweisen Umsetzung unserer CO₂-Neutralitätsstrategie haben wir messbare Zwischenziele für die Jahre 2025 und 2030 definiert:

Scope 1+2 (betriebene Anlagen weltweit):	Scope 3 (Produktnutzung durch Kunden):
<p>Während Scope1 direkte Emissionen aus eigenen Anlagen umfasst, beinhaltet Scope 2 indirekte Emissionen durch Energielieferanten.</p> <ul style="list-style-type: none">• Reduktion der Netto-Treibhausgasemissionen um mindestens 40 % bis 2030 (Vergleichsjahr: 2015)• Methanemissionen: –80 % bis 2030 (Vergleichsjahr: 2020)• Routinemäßiges Abfackeln von Erdgas: vollständige Einstellung bis 2030	<p>Scope 3 deckt alle übrigen indirekten Emissionen ab, die in der Lieferkette oder durch die Nutzung unserer Produkte durch Kunden entstehen.</p> <ul style="list-style-type: none">• Absolute Emissionen weltweit unter dem Niveau von 2015 halten (bis 2030)• CO₂-Intensität der Energieprodukte: –25 % weltweit bis 2030 (Vergleichsjahr: 2015)• Emissionen in Europa: –30 % bis 2030 (Vergleichsjahr: 2015)

Source: <https://totalenergies.de/ueber-uns/ambition> (consulted 18/03/2026; 27/04/2026; 26/05/2026). English text with automatic translation: ‘TotalEnergies is **facing up to the challenges of climate change**. As a global multi-energy company, we are continuing on our course in the energy transition – with the **goal of CO₂ neutrality by 2050, together with society**. Step by step. **Our path to CO₂ neutrality together with society. To support the goals of the Paris Agreement to limit the global average temperature to below 2°C if possible, we are transforming our entire company. Our strategy covers all emissions from the production to the use of the energy products sold by our customers (Scopes 1, 2 and 3). For the gradual implementation of our CO₂ neutrality strategy, we have defined measurable interim targets for the years 2025 and 2030: [...].’**

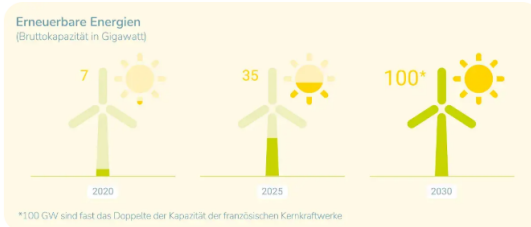
The company also claims its goal to expand renewable energy and be one of the five largest producers of renewable energy in the world. When making this claim, TotalEnergies Germany omits to provide information on the share that development of renewables represents compared to its fossil fuel activities (as mentioned above, it is expected that TotalEnergies’ share of renewables will represent 8% in 2030, compared to 83% of oil and gas).

²¹ <https://totalenergies.de/services/heizoel/privatkunden> (accessed 27/04/2026).

²² <https://totalenergies.de/ueber-uns/ambition/co2-strategie> (accessed 27/04/2026).

Unsere Ambition beim Ausbau der erneuerbaren Energien

Ausbau von Wind- und Solarenergie



Der Ausbau von **Windenergie** und **Solarenergie** wird eine immer wichtigere Rolle einnehmen. TotalEnergies verfolgt die Ambition, zu den fünf größten Produzenten erneuerbarer Energien weltweit zu gehören und bis 2030 insgesamt 100 Gigawatt erneuerbaren Strom zu produzieren. Als Zwischenetappe bis 2025 hat sich das Unternehmen 35 Gigawatt vorgenommen.

Source: <https://totalenergies.de/ueber-uns/ambition/ausbau-erneuerbare-energien> (consulted 18/03/2026; 27/04/2026; 26/05/2026). English text with automatic translation: 'The expansion of Wind energy and Solar energy will play an increasingly important role. TotalEnergies aims to be **one of the five largest producers of renewable energy in the world** and to produce a total of 100 gigawatts of renewable electricity by 2030. As an intermediate stage until 2025, the company has set itself 35 gigawatts'.

Moreover, TotalEnergies markets (at least) in Germany heating oil under the name "Bio Premium Thermogreen," thus making both a generic environmental claim and a claim based on limited sustainability benefits, on a highly polluting fossil-fuel product.

Produkt	Preis für 100 Liter inkl. MwSt.
Premium thermoplus <small>Preis für 100 Liter inkl. MwSt.</small>	119,20 €
Bio Premium thermogreen <small>Preis für 100 Liter inkl. MwSt.</small>	135,86 €
Heizöl schwefelarm <small>Preis für 100 Liter inkl. MwSt.</small>	116,82 €

- Premium thermoplus:**
 - ✓ Erfüllt die DIN 51603-1
 - ✓ Saubere Verbrennung mit minimalen Rückständen
 - ✓ Angereichert mit Additiven für bessere Qualität
 - ✓ Längere Lagerfähigkeit durch spezielle Formel
 - ✓ Schutz der Ölheizung durch reinigende und antikorrosive Additive
 - ✓ Angenehmer, dezenter Geruch
 - ✓ Schnelle Lieferung
 - ✓ Premiumqualität
- Bio Premium thermogreen:**
 - ✓ Konstante Leistung durch spezielle Zusätze, die die Ölqualität stabil halten und die Lebensdauer der Ölheizung erhöhen
 - ✓ Schnelle Lieferung
 - ✓ Lagerung in Kunststoff- und Stahltanks
 - ✓ Nachhaltig: Mindestens 10 % Bioanteil aus nachwachsenden Rohstoffen
 - ✓ Höhere Lagerfähigkeit
 - ✓ Vielseitig einsetzbar: Für Einstrangversorgung und konventionelle Anlagen geeignet
 - ✓ Premiumqualität gem. DIN 51603-6 EL A Bio10
- Heizöl schwefelarm:**
 - ✓ Schnelle Lieferung
 - ✓ Schwefelarm bei einem geringen Schwefelgehalt (max. 0,005 %)
 - ✓ Kontrollierte Standardqualität gem. DIN 51603-1

Source: <https://energieshop.totalenergies.de/> (consulted 19/03/2026). English text with automatic translation: 'Heating oil [...] **Bio Premium thermogreen** [...] **Sustainable**: at least 10% organic from renewable raw materials.'

TotalEnergies (Belgium)

In Belgium, TotalEnergies presents itself as global leader in the development of photovoltaic projects, highlighting its ambition to reach 100GW of renewable capacity by 2030 and its investments in energy storage. However, these claims relate only to a limited part of company's activities and give a misleading impression of its overall sustainability performance. By emphasising investments in renewables without placing them in the context of its core business, TotalEnergies fails to present these claims in a relative and balanced manner. Renewable energy represents only a marginal share of the company's activities, while its continued reliance on fossil fuels results in a highly negative overall environmental impact.

TotalEnergies also makes a claim about its future environmental goal to become carbon neutral by 2050. Its claim focuses only on scope 1 and 2 emissions (its own greenhouse gas emissions), while leaving out scope 3 emissions (the emissions of all fossil fuels sold by TotalEnergies to consumers). This claim has been found to be misleading for consumers by a French court.

Ce qu'il faut retenir

- TotalEnergies est le leader mondial dans le développement de projets photovoltaïques
- Nous visons les 100 GW de capacité renouvelable en 2030
- Et la neutralité carbone d'ici 2050
- Nous investissons aussi dans le stockage d'énergie et la fabrication de batteries

Source: <https://totalenergies.be/fr/particuliers/blog/lactu/championne-du-monde-de-lenergie-solaire> (consulted 18/03/2026). English text with automatic translation: 'What you need to remember: TotalEnergies is the world leader in the development of photovoltaic projects. We are aiming for 100 GW of renewable capacity by 2030. And carbon neutrality by 2050. We are also investing in energy storage and battery manufacturing.'

In addition, through its commercial website, TotalEnergies advertises the environmental performance of natural gas, as **an ecological and non-toxic energy**, next to a box with a link nudging consumers to switch to natural gas and subscribe to a gas contract. Advertising gas as environmentally friendly product is false and misleading for consumers, as highlighted in the study accompanying this CPC alert. Moreover, claiming that natural gas emits less CO₂ than oil and carbon, is a misleading comparative claim

by omission as it fails to consider the methane emissions caused by the production, transportation, distribution and use of gas. Methane is a highly potent greenhouse gas, and such leaks can have climate impacts comparable to, or even greater than, those associated with the extraction and use of coal and oil.

TotalEnergies presents natural gas as a win for the environment and for consumers, claiming cost savings thanks to the use of efficient boilers. These claims are reinforced with green imagery through the picture of a forest and the use of green fonts.

The screenshot shows the TotalEnergies website interface. At the top, there is a navigation bar with the TotalEnergies logo on the left, followed by menu items: 'Particuliers', 'Professionnels', and 'Grandes entreprises'. On the right side of the navigation bar, there is a language selector set to 'FR'. Below the navigation bar, there are several menu items: 'Électricité et gaz', 'Solutions énergétiques', and 'TotalEnergies'. To the right of these are two buttons: 'Aide & Contact' and 'Mon espace client'. The main content area features a large image of modern pendant lights. To the left of the image, the text reads: 'Le gaz naturel : c'est quoi ?' followed by a large green heading 'Le gaz naturel. Une source d'énergie écologique et avantageuse'. Below the heading, there are two paragraphs of text explaining natural gas as a natural fuel and its presence in the earth's crust.

Source: <https://totalenergies.be/fr/particuliers/produits-et-services/my-home/electricite-et-gaz/notre-energie-durable/gaz-naturel> (consulted 18/03/2026; 27/04/2026). English text with automatic translation: 'What is natural gas? Natural gas. An ecological and advantageous source of energy.'



Pourquoi le gaz naturel ?

Le gaz naturel est certes un combustible fossile, mais il est beaucoup **moins polluant** que le pétrole ou le charbon, par exemple.

Ainsi, lors de sa combustion, il produit 25 % de CO₂ en moins que le mazout. Il ne produit pratiquement pas d'oxyde d'azote, d'oxyde de soufre ou de suie.

Outre l'environnement, votre portefeuille se réjouit aussi de la présence du gaz naturel ! Les chaudières à condensation actuelles sont les plus performantes du marché. D'où une **diminution de votre consommation**.

Les acheteurs de TotalEnergies scrutent les prix du marché et négocient constamment avec les fournisseurs de gaz naturel pour vous offrir **les meilleurs prix**.

Vous bénéficiez donc toujours d'un tarif avantageux !

Faites un choix avantageux

Je passe au gaz naturel

Source: <https://totalenergies.be/fr/particuliers/produits-et-services/my-home/electricite-et-gaz/notre-energie-durable/gaz-naturel> (consulted 18/03/2026; 27/04/2026). English text with automatic translation: 'Why natural gas? Natural gas is a fossil fuel, but it is much less polluting than oil or coal, for example. Thus, when burned, it produces 25% less CO₂ than oil. It produces virtually no nitrogen oxide, sulfur oxide, or soot. In addition to the environment, your wallet is also happy about the presence of natural gas! [...] Make an advantage choice. I'm switching to natural gas.'

TotalEnergies (Spain)

TotalEnergies commercial website in Spain²³ includes a dedicated section on “Renewables”²⁴. In this section, the company advertises its objective of reaching climate neutrality of its activities and products by 2050 and being within the top five leaders in renewable energy.

Nuestros proyectos

Somos una compañía multienergías global con el objetivo de alcanzar la neutralidad de carbono en nuestras operaciones y productos para 2050 posicionándonos en el Top 5 mundial en energías renovables.

Energía sostenible y compatible con la biodiversidad



Source: <https://renovables.totalenergies.es/> accessible through <https://www.totalenergies.es/es/hogares> (consulted 18/03/2026; 27/04/2026; 27/05/2026). English text with automatic translation: ‘We are a global multi-energy company with the **goal of achieving carbon neutrality in our operations and products by 2050** by positioning ourselves in the **world's Top 5 in renewable energy**. [...] Sustainable and biodiversity compatible energy.’

¿Es el gas una energía eficiente?

Creemos que la mejor forma de cuidar de ti también es cuidar de nuestro planeta. Por eso apostamos por el uso de energía eficiente, como el gas natural.

El gas natural tiene un alto poder calorífico y bajas emisiones de contaminantes atmosféricos a la hora de su combustión.

¿Sabías que el gas natural emite en su combustión hasta un 25 a 30% menos de CO₂ que los productos derivados del petróleo? ¡Y entre un 40% y un 50% menos de CO₂ que el carbón!

En TotalEnergies trabajamos con las últimas novedades en tecnología para producir energía más eficiente y ayudarte a ahorrar en tu consumo anual de gas y electricidad.

Source: <https://www.totalenergies.es/es/hogares/tarifas-gas/a-tu-aire> under FAQ section (consulted 18/03/2026; 27/04/2026). English text with automatic translation: ‘Is gas an efficient energy? We believe that the best way to take care of yourself is also to take care of our planet. That is why we are committed to the use of efficient energy, such as natural gas. **Natural gas has a high calorific value and low emissions of atmospheric pollutants** when burning. Did you know that natural gas emits up to 25 to 30% less CO₂ than petroleum products when burned? And 40% to 50% less CO₂ than coal! At TotalEnergies we work with the latest developments in technology to produce more efficient energy and help you save on your annual gas and electricity consumption.’

²³ <https://www.totalenergies.es/es/hogares> (accessed 26/05/2026).

²⁴ <https://renovables.totalenergies.es/> (accessed 26/05/2026).

Eni Plenitude

Eni Plenitude belongs to the ENI group which is one of the biggest European integrated oil and gas companies. EniPlenitude represents a ‘green’ spinoff of Eni, marketed under a separate brand to benefit from a ‘halo’ effect. The logo of EniPlenitude is a green version of the logo of ENI.



With this strategy, ENI can give an impression of the overall greenness of the company by focusing on the investments in renewable energy made by Eni Plenitude. This may constitute a misleading omission. ENI’s climate strategy is not aligned with the Paris Agreement, as the company continues to invest heavily in hydrocarbons, in particular on upstream and midstream gas. By 2028, Eni plans to direct around 76 % of its investments towards oil and gas, while only 17 % is allocated to renewable activities.²⁵

While Eni Plenitude is expanding its portfolio of renewable power, storage, and electric vehicle charging, its core business model remains predominantly centred on fossil fuels, particularly gas. Overall, the scale of its gas activities continues to significantly outweigh its renewable electricity generation, highlighting a structural reliance on fossil energy²⁶.

Eni Plenitude’s climate neutrality and sustainability claims cannot be substantiated given that a majority of the company is owned and controlled by ENI, and that fossil gas represents a core share of Eni Plenitude itself.

Eni Plenitude Italy

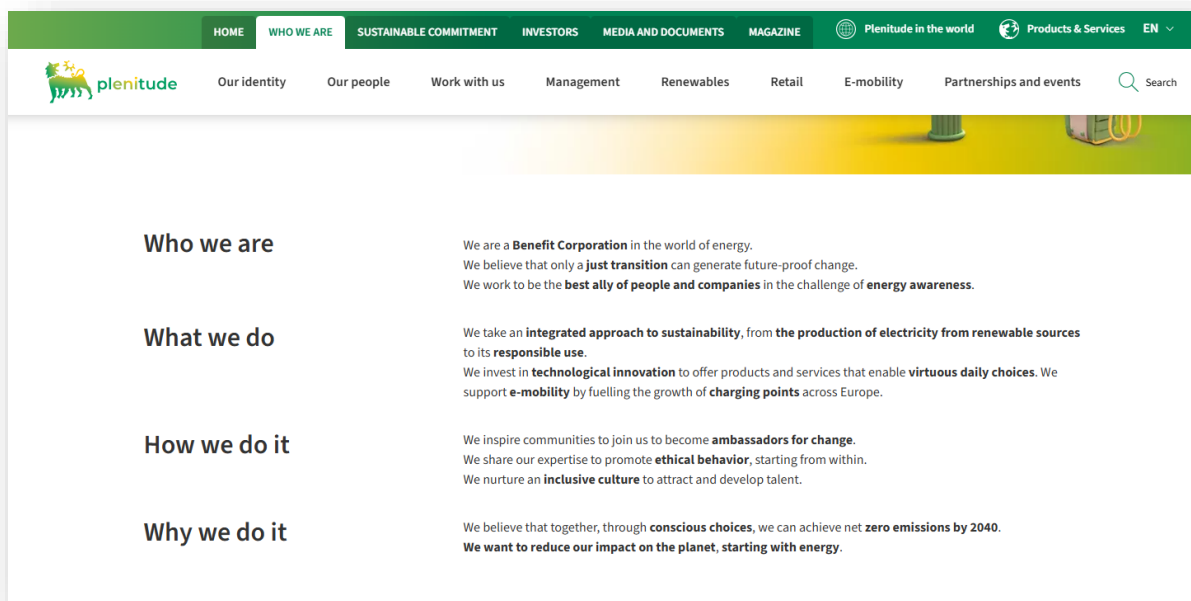
Eni Plenitude’s Italian commercial website has a dedicated section “Discover Eni Plenitude”²⁷ which leads consumers to the corporate website of the company where it

²⁵ Reclaim Finance (2025), *Assessment of ENI’s Climate Strategy*.

²⁶ Eni S.p.A. (2025), *Annual Report 2024*, “EniLive and Plenitude – Key performance indicators”. See also *Greenpeace evaluation of the company sales in 2021* based on data from the company itself: gas supplies represented 65 percent, while **electricity** sales were equal to 35 percent. But much of this electricity is also derived from fossil sources.

²⁷ See “Scopri Plenitude” (<https://eniplenitude.com/contatti>) reachable via ENiPlenitude commercial website <https://eniplenitude.com/contatti> (accessed 27/05/2026).

advertises its sustainability and climate responsible approach, including its net zero emissions by 2040.



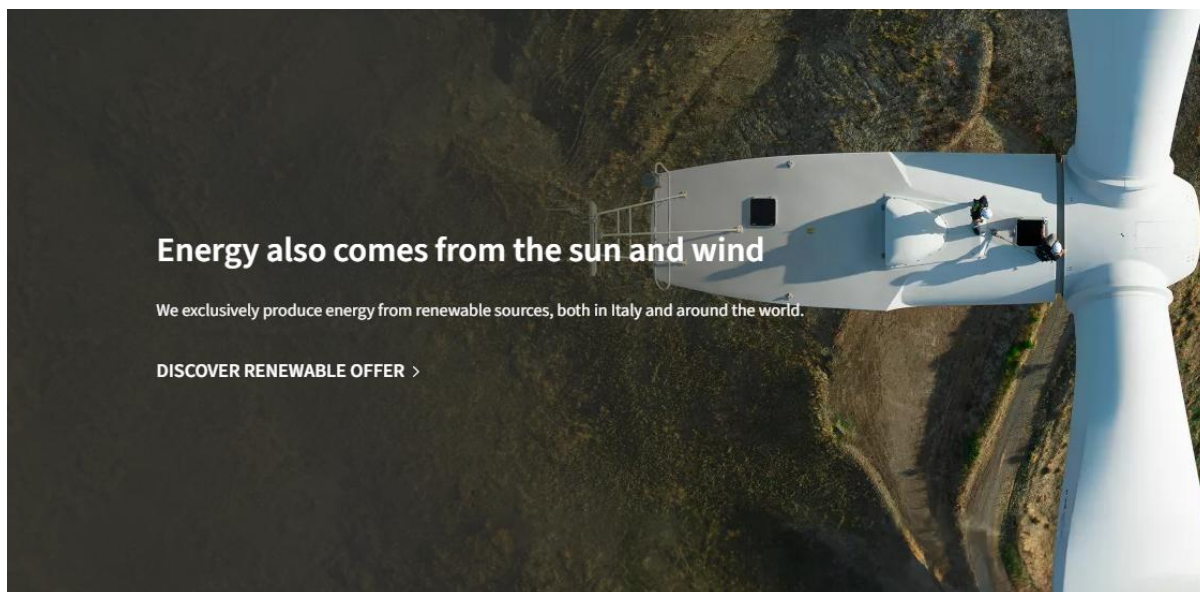
Source: <https://corporate.eniplenitude.com/it/chi-siamo/la-nostra-identita> (consulted 27/04/2026).



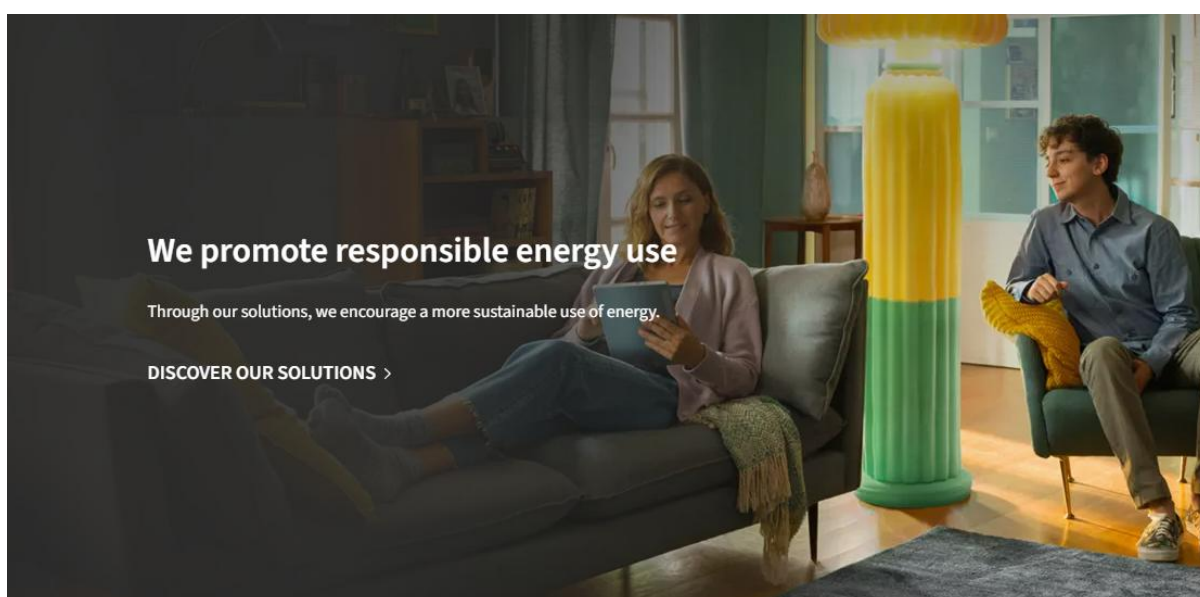
Source: <https://corporate.eniplenitude.com/it/impegno-sostenibile/strategia> (consulted 27/04/2026; 27/08/2026).

In addition, the corporate website of Eni Plenitude Italy, accessible through the section “discover us” of the commercial website, displays other environmental claims that may

give consumers the impression that the company's activities are based solely on renewable energy²⁸. The website also includes claims related to CO2 compensation.



Source: <https://corporate.eniplenitude.com/it/home-page?prov=c> accessible through the commercial website <https://eniplenitude.com/contatti> (consulted 26/03/2026; 28/05/2026).



Source: <https://corporate.eniplenitude.com/it/home-page?prov=c> accessible through the commercial website <https://eniplenitude.com/contatti> (consulted 26/03/2026; 28/05/2026).

²⁸ They can be assessed as environmental claims based on limited sustainability aspects or a claim about the trader's entire business when it actually concerns only a certain aspect or unrepresentative activity of the trader. As highlighted by recital (11) of the Empowering Consumers Directive, an example of such claims is when a "trader gives the impression that it is only using renewable energy sources when in fact several of the trader's business facilities still use fossil fuels."

Un modello di business distintivo

Lavoriamo costantemente per essere il miglior alleato delle persone nella sfida della consapevolezza energetica: come Società Benefit, operiamo nell'ambito dell'**energia**, del **gas** e dei **servizi**, offrendo ai **clienti domestici** e alle **aziende** la possibilità di prendere parte al cambiamento e di contribuire alla transizione, cercando di fornire loro tutta l'energia di cui necessitano per la propria casa, città e per i propri progetti.

Per farlo, abbiamo creato un modello di business distintivo che unisce:



La produzione di energia elettrica da fonti rinnovabili



La vendita di energia e di soluzioni energetiche



Un'ampia rete di punti di ricarica per veicoli elettrici

Offriamo energia elettrica certificata da garanzie d'origine di provenienza europea e diamo ai nostri clienti la possibilità di stipulare contratti in cui è prevista la compensazione delle emissioni di CO₂ "Scope 3". Le nostre **soluzioni** spaziano dall'**efficientamento** degli edifici, alla scelta di elettrodomestici ad alta efficienza fino a una vasta gamma di **servizi per la casa**, per le **comunità** e per le **aziende**. Siamo infatti al fianco di queste ultime per migliorare le loro prestazioni energetiche, diffondendo best practice e creando **valore condiviso**.

Source: <https://corporate.eniplenitude.com/it/chi-siamo/soluzioni-energetiche> accessible through the commercial commercial website <https://eniplenitude.com/contatti> (consulted 26/03/2026; 27/05/2026). English text with automatic translation: 'We are constantly working to be **people's best ally** in the challenge of energy awareness: as a *Benefit Corporation*, we operate in the **energy, gas and services** sectors, offering **domestic customers** and **companies** the opportunity to take part in the change and contribute to the transition, [...] To do this, we have created a distinctive business model that combines: the production of electricity from renewable sources. The sale of energy and energy solutions [...] We offer electricity certified by guarantees of origin of European origin and give our customers the opportunity to enter into contracts in which the compensation of "Scope 3" CO₂ emissions is envisaged'.

Plenitude

a name that represents the fully integrated nature of our offering and our approach to sustainability, from energy production to responsible use.



Our goal is to be the **best ally** to embrace energy awareness.

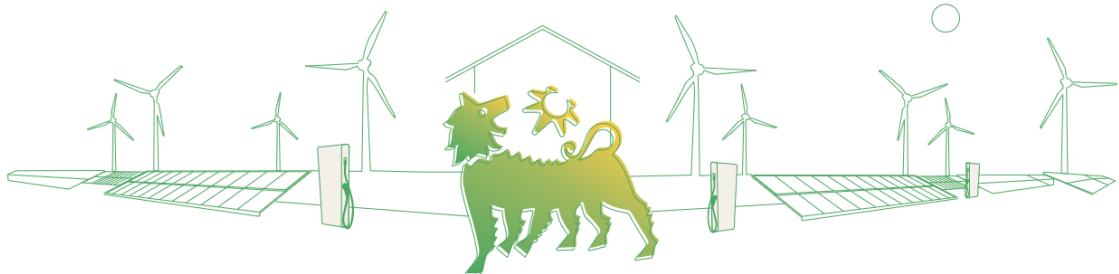


We inspire communities to join us and become **ambassadors of change**.



We promote an **inclusive culture** to attract and develop talent.

Discover more



Source: <https://corporate.eniplenitude.com/it/home-page?prov=c> accessible through the commercial commercial website <https://eniplenitude.com/contatti> (consulted 26/03/2026; 27/05/2026).

Eni Plenitude France

Through the section “About Us” in the commercial website, Eni Plenitude emphasises its investments to increase the share of renewable energy in its offer. However, the company fails to provide information on the actual share that renewable energy represents in the overall production and sales of the company.

The company also claims that to meet everyone’s needs, it continues to offer gas, while supporting customers with alternative energy sources, without clarifying what sources these are to replace gas. In particular, the commercial website does not seem to propose the installation of heat pumps.

The company describes natural gas as a non-renewable fossil fuel. However, by emphasising that it is composed of methane, a light hydrocarbon, the company might give the impression to consumers of a low environmental impact, while omitting the fact that methane is a potent greenhouse gas and that natural gas is a heavily polluting fossil fuel.



¹ 1 028 000 clients sur le segment des résidentiels selon le Rapport de la CRE sur le fonctionnement des marchés de détail français de l'électricité et du gaz naturel entre 2020 et 2022, page 4 – novembre 2023.

(1) Pour chaque MWh d'électricité consommé par nos clients, Plenitude garantit, à travers le mécanisme des garanties d'origine, qu'un MWh produit à partir de sources renouvelables françaises (ex: énergie solaire, hydraulique, éolienne, géothermique, marémotrice ou issue de la biomasse) a été injecté sur le réseau électrique.

(2) Gaz naturel : le gaz naturel est une énergie fossile qui, par définition, n'est pas renouvelable. Cette source d'énergie est composée principalement de méthane (CH₄), un hydrocarbure léger. Consciente que de nombreux français sont toujours alimentés en gaz, Plenitude continuera de fournir ses clients qui le demandent, tout en poursuivant le développement de solutions alternatives et efficaces pour permettre d'en dépendre de moins en moins.

(3) Plenitude On the Road[®] est une marque utilisée par Plenitude On The Road S.r.l. qui fournit le service de mobilité électrique. Plenitude On The Road est une société du Groupe Plenitude.

Source: <https://www.eniplenitude.fr/decouvrez-plenitude> (consulted 27/04/2026; 27/05/2026). English text with automatic translation: **'Electricity and gas. Take advantage of 100% French green electricity offers¹. To meet your needs, we continue to offer² natural gas offers. [...] (2) Natural gas: Natural gas is a fossil fuel that, by definition, is not renewable. This energy source is composed mainly of methane (CH₄), a light hydrocarbon. Aware that many French people are still supplied with gas, Plenitude will continue to supply its customers who request it, while continuing to develop alternative and effective solutions to make it possible to depend less and less on it.'**

Plenitude en France, une marque engagée pour ses clients

Chez Plenitude, nous avons un objectif simple : devenir un partenaire de confiance pour répondre aux attentes croissantes de nos clients à l'heure de la transition énergétique. Toutes nos offres d'électricité sont désormais des offres vertes d'électricité 100 % garanties d'origine renouvelable française¹. Aussi, pour répondre au besoin de tous, nous continuons à proposer des offres de gaz naturel² tout en accompagnant nos clients vers des énergies alternatives.

Toujours au plus près de vos besoins !

Devenir l'un des premiers fournisseurs d'énergie en France, en offrant des services de qualité, basés sur des outils et technologies modernes, et en investissant dans les énergies renouvelables. En France, c'est près d'un million de clients résidentiels qui nous font confiance*. Plenitude est présent dans plus de 15 pays à travers le monde et fournit actuellement de l'énergie à plus de 10 millions de foyers et d'entreprises en Europe.

En France, nos trois priorités pour être au plus près de vos besoins :

- **La transparence** : des offres claires et sans surprises.
- **La transition énergétique** : investir chaque jour pour augmenter la part des énergies renouvelables dans nos offres.
- **La proximité** : un service client réactif, disponible du lundi au vendredi de 9 h à 17 h, avec des experts énergie pour vous conseiller rapidement et efficacement.

Nous faisons aussi attention à l'impact de nos locaux : nos bureaux sont certifiés BREEAM et HQE, deux labels qui garantissent une gestion responsable de l'énergie, de l'eau et des matériaux, tout en assurant un environnement sain et confortable pour nos équipes.

Source: <https://www.eniplenitude.fr/decouvrez-plenitude> (consulted 27/04/2026; 27/05/2026). English text with automatic translation: *'Plenitude in France, a brand committed to its customers. At Plenitude, we have a simple goal: to become a trusted partner to meet the growing expectations of our customers at the time of energy transition. All our electricity offers are now green electricity offers that are 100% guaranteed to be of French renewable origin¹. Also, to meet everyone's needs, we continue to offer natural gas² while supporting our customers towards alternative energies. [...] The energy transition: investing every day to increase the share of renewable energies in our offers.'*

The commercial website of Eni Plenitude France includes a hyperlink in its 'Plenitude in the world section' section, directing consumers to the corporate website which displays claims concerning its net zero emissions targets by 2040.

Plenitude dans le monde

Plenitude s'efforce d'être le meilleur allié des consommateurs en renforçant sa présence dans le secteur des énergies renouvelables. Plenitude favorise un environnement de travail inclusif pour plus de 2700 employés. Son engagement repose sur plusieurs critères environnementaux, sociaux et de gouvernance. Pour en savoir plus, cliquez [ici](#).

Source: <https://www.eniplenitude.fr/decouvrez-plenitude> (consulted 27/04/2026; 27/05/2026). English text with automatic translation: *'Plenitude in the world. Plenitude strives to be the best ally of consumers by strengthening its presence in the renewable energy sector. [...] Its commitment is based on several environmental, social and governance criteria. To learn more, click here.'*

The 5 pillars of our ESG model



Climate and emissions



To achieve **Net Zero Scope 1, 2 and 3 by 2040**, Plenitude has defined a decarbonization strategy that includes increasing power production from renewable sources by increasing the installed capacity of plants, selling power certified by guarantees of origin¹¹ and solutions aimed at reducing energy consumption, developing services dedicated to electric mobility and, finally, offsetting remaining CO₂ emissions through carbon offsets.

Source: <https://corporate.eniplenitude.com/en/sustainability-commitment/strategy> accessible through the commercial website <https://www.eniplenitude.fr/decouvrez-plenitude> (consulted 27/04/2026; 27/05/2026; 27/05/2026).

Zenith (EniPlenitude Greece)



Ο πρώτος πάροχος κοντά στην επίτευξη Κλιματικής Ουδετερότητας στην Ελλάδα

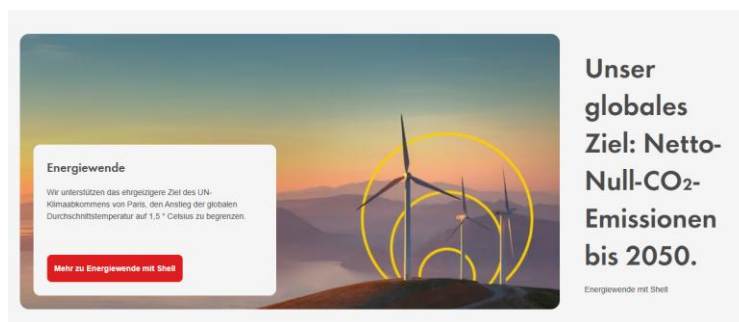
Η ZeniΘ ως ο κορυφαίος πάροχος ενέργειας στην Ελλάδα, πρωτοστατεί στο χώρο της ενέργειας πετυχαίνοντας το 68% της διαθέσιμης ενέργειας να προέρχεται από Ανανεώσιμες Πηγές (σύμφωνα με στοιχεία του ΔΑΠΕΕΠ), ξεπερνώντας τον εθνικό στόχο της Ελλάδας για το 2030 (61%) και της Ευρώπης (60%). Καθιστώντας τη ZeniΘ ως τον πρώτο πάροχο κοντά στην επίτευξη **Κλιματικής Ουδετερότητας** στην Ελλάδα. Συμβάλλοντας στον στόχο της χώρας να βελτιώσει την κατάταξή της στον Δείκτη Απόδοσης Κλιματικής Αλλαγής (CCPI).

Source: <https://zenith.gr/el/company/ta-proionta-ilektrikis-energeias-tis-zenith-eginan-prasina/> (consulted 26/03/2026; 27/05/2026). English text with automatic translation: **'The first provider close to achieving Climate Neutrality in Greece. ZeniTH as the leading energy provider in Greece, is leading the way in the field of energy, achieving 68% of the available energy coming from Renewable Sources (according to data from DAPEEP), surpassing the national target of Greece for 2030 (61%) and Europe (60%). Making Zenith the first provider close to achieving Climate Neutrality in Greece. Contributing to the country's goal of improving its ranking in the Climate Change Performance Index (CCPI).'**



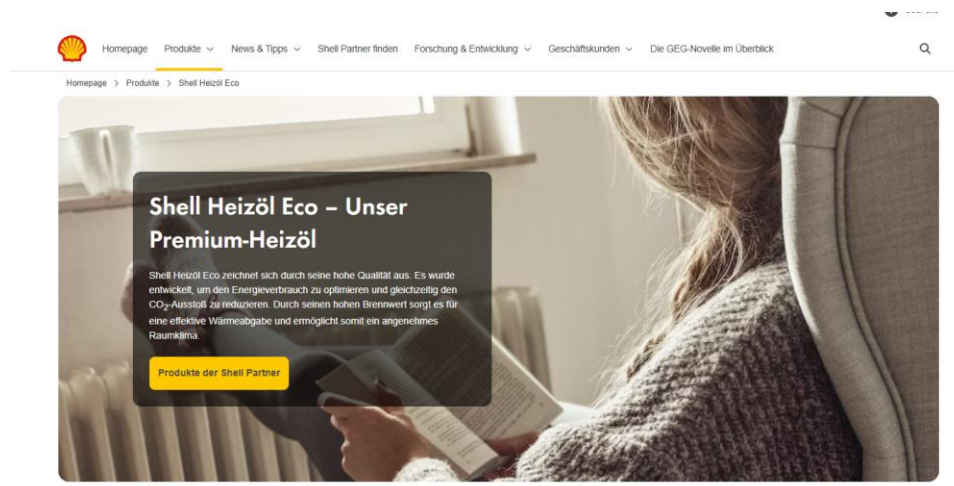
Shell (Germany)

Shell in Germany claims that it aims to achieve net-zero CO₂ emissions by 2050 and supports the EU's Paris Agreement objective of limiting the rise in average global temperature to 1.5°C. However, this claim is undermined by Shell's substantial investments in fossil fuels, which are projected to make it one of the leading oil and gas companies by 2030.²⁹



Source: <https://hauswaerme.shell.de/> (consulted 19/03/2026; 27/05/2026). English text with automatic translation: *'Our global goal: net-zero CO₂ emissions by 2050. Energy transition. We support the more ambitious goal of the UN Paris Climate Agreement to limit the increase in the average global temperature to 1.5° Celsius.'*

Shell markets heating oil under the label “Eco,” claiming it is designed to reduce energy consumption and CO₂ emissions.



Source: <https://hauswaerme.shell.de/produkte/heizoel-eco.html> (consulted 26/03/2026; 27/05/2026). English text with automatic translation: *'Shell Heating Oil Eco – Our premium heating oil [...] It has been developed to optimise energy consumption and at the same time reduce CO₂ emissions.'*

²⁹ [Reclaim Finance \(2025\). Assessment of Shell's Climate Strategy.](#)

Shell (Energy Direct Austria)

Shell Heating Oil Eco is also marketed in Austria, under the general claims “Eco” and clean. Energy Direct offering Shell Heating Oil Eco claims that oil can be a sustainable option for consumers. It presents liquid fuels as an option contributing to the Paris Climate Agreement. It discourages consumers from changing heating systems.

The screenshot shows the 'FAQ zu Ihrer Ölheizung' page on the EnergieDirect website. The page lists several frequently asked questions with expandable answers:

- Muss ich meine Ölheizung entfernen?
- Was bedeutet das Ölheizungsverbot?
- Darf ich noch meine Ölheizung modernisieren?
- Wie lange darf ich noch mit Heizöl heizen?
- Wird Heizöl abgeschafft?
- Flüssig bleiben – nachhaltig werden!

The answer to 'Flüssig bleiben – nachhaltig werden!' states: 'Flüssige Brennstoffe werden auch in Zukunft eine große Rolle in der Energieversorgung spielen. "Die gesamte Branche bekennt sich zu den Zielen des Pariser Klimaschutzabkommens und zu der in der österreichischen Klima- und Energiestrategie #mission2030 vorgesehenen Forcierung von Energieeffizienz", sagt Martin Reichard, Geschäftsführer der EWO Austria. Um Heizungen zukunftsfähig zu machen, wird intensiv an der Herstellung von technologieneutralen, alternativen und klimafreundlichen Flüssig-Brennstoffen geforscht.'

Source: <https://www.energie-direct.at/klimaschutzprogramm#faq-oelheizung> (consulted 25/03/2026; 27/04/2026; 27/05/2026). English text with automatic translation: **'Stay liquid – become sustainable! Liquid fuels will continue to play a major role in the energy supply in the future. "The entire industry is committed to the goals of the Paris Climate Agreement and to the promotion of energy efficiency #mission2030 envisaged in the Austrian climate and energy strategy," says Martin Reichard, Managing Director of EWO Austria. In order to make heating systems fit for the future, intensive research is being carried out on the production of technology-neutral, alternative and climate-friendly liquid fuels.'**

The screenshot shows the 'Shell Heizöl Eco' benefits page on the EnergieDirect website. It features a diagram illustrating the 'Shell Effizienz-Formel' (Shell Efficiency Formula) and a diagram of a heating system with numbered components.

The formula is: **1. Auffrisch-Effekt + 2. Reinheits-Effekt + 3. Leichtstart-Technologie = Shell Effizienz-Formel**

The diagram shows a tank with '1. Shell Auffrisch-Effekt' and a boiler with '2. Shell Reinheits-Effekt' and '3. Shell Leichtstart-Technologie'.

Shell Heizöl Eco: Sparsamer, Sauberer, Sicherer.

Genießen Sie zahlreiche Vorteile mit unserem Premium-Heizöl Eco. Mit Shell Heizöl Eco wird die Bildung von Ablagerungen in Tank und Leitungen um die Hälfte verringert und hilft somit, den Heizölverbrauch zu senken und aktiv Geld zu sparen. Mit der Shell Effizienz-Formel heizen Sie sparsamer, sauberer und sicherer.

Source: <https://www.energie-direct.at/privatkunden/shell-heizoel-eco> (consulted 25/03/2026). English text with automatic translation: **'Shell Heating Oil Eco: More economical, cleaner, safer. Enjoy numerous advantages with our premium heating oil Eco. With Shell Heating Oil Eco, the formation of deposits in the tank and pipes is reduced by half, thus helping to reduce heating oil consumption and actively save money. With the Shell Efficiency Formula, you can heat more economically, cleaner and safer.'**

Shell Heizöle - Immer die richtige Wahl

Ihre Ölheizung liefert Ihnen 24 Stunden am Tag zuverlässig Wärme für Ihr behagliches Zuhause. Heizöle unterscheiden sich gravierend, wenn es um Effizienz, Umweltbelastung und die Abnutzung Ihrer Heizöl-Anlage geht. Wer Heizöl kaufen möchte, trifft mit Shell Heizölen die richtige Entscheidung. Shell Heizöle bieten für jeden Bedarf das richtige Produkt, schonen Ihre Heizöl-Anlage und tragen zu einem reibungslosen Betrieb bei. Wir beraten Sie gerne, welches Heizöl das Richtige für Sie ist.

Source: <https://www.energiesdirect.at/privatkunden/shell-heizoole-kaufen> (consulted 27/04/2026). English text: ‘**Shell Heating Oils - Always the right choice.** [...] Heating oils differ significantly when it comes to efficiency, environmental impact and the wear and tear of your heating oil system. If you want to buy heating oil, Shell heating oils is the right decision. Shell heating oils offer the right product for every need [...].’

Shell (DCD Energi Denmark)

1. Vælg fyringsolie

MEST POPULÆRE

<div style="border: 1px solid #ccc; padding: 10px; background-color: white;"> <h4 style="margin: 0;">Shell Thermo Premium</h4> <ul style="list-style-type: none"> Den avancerede fyringsolie, der øger effektiviteten Længere holdbarhed <hr style="border: 0.5px solid #ccc;"/> <p style="font-size: 0.8em; margin: 0;">Pris pr. 1.000 liter</p> <p style="font-size: 1.2em; margin: 0;">20.907,50 kr.</p> </div>	<div style="border: 1px solid #ccc; padding: 10px; background-color: white;"> <h4 style="margin: 0;">Shell Thermo Eco Ultra</h4> <ul style="list-style-type: none"> Forbrænder mere effektivt Lavt svovlindhold. Anbefalet til kondenserende kedler <hr style="border: 0.5px solid #ccc;"/> <p style="font-size: 0.8em; margin: 0;">Pris pr. 1.000 liter</p> <p style="font-size: 1.2em; margin: 0;">20.957,50 kr.</p> </div>	<div style="border: 1px solid #ccc; padding: 10px; background-color: white;"> <h4 style="margin: 0;">Shell Thermo Fyringsolie</h4> <ul style="list-style-type: none"> Pålidelig og stabil basisfyringsolie til alle oliefyr Frostsikret ned til -20 grader <hr style="border: 0.5px solid #ccc;"/> <p style="font-size: 0.8em; margin: 0;">Pris pr. 1.000 liter</p> <p style="font-size: 1.2em; margin: 0;">20.607,50 kr.</p> </div>
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Source: <https://www.dccenergi.dk/produkt/fyringsolie/> (consulted 29/04/2026). English text with automatic translation: ‘**Shell Thermo Eco Ultra:** ✓ Burns more efficiently ✓ **Low sulphur content.** Recommended for condensing boilers.’