Paradigm

Greenwashing Attitudes and Ethical Aspects in Bulgarian Tourism Business

Todor Konstantinov DYANKOV*
University of Economics – Varna
**Corresponding author, todordyankov@ue-varna.bg*

Velina KAZANDZHIEVA
University of Economics – Varna
velina_kaz@ue-varna.bg

Abstract. *In the ever-expanding environment of the regulatory frameworks and rules of the European Union, greenwashing is becoming a highly subtle and widespread marketing practice in different areas of industries, including tourism. For that reason, the general purpose of this article is to explore the managerial attitudes towards potential greenwashing pitfalls amongst tourism companies in Bulgaria by taking into consideration the ethical aspects and specific corporate communication. The current research study is based on the of use of an embedded single-case design involving the expert views from eight tourism companies in the role of representative business units from different tourism sectors (a seaside resort and hotels, a city hotel, a tour operator and a travel agency, a regional museum and an airport managing company). For the empirical part of the study, data were collected during the period October-December 2025 in alignment with a hybrid survey tool combining the characteristics of structured Likert-scale multiple-choice questions and additional open-ended questions in the form of unstructured interviews. The results from the empirical research indicate the presence of certain sectoral differences across the surveyed business units: companies with intensive use of infrastructural elements (the hotels and the tour operator) report for their higher engagement in particular green practices like waste, energy, water management and plastics reduction, whereas the travel intermediaries and the cultural institution primarily express their preferences in the field of green initiatives in customer relations. For most of the interviewed experts the explicit levels of high implementation costs, administrative burden and limited public incentives are perceived as major barriers for transition of their companies towards a holistic green orientation. On the other hand, respondents generally support stricter EU rules against misleading corporate green assertions by taking into account the existent skepticism among tourists towards green marketing communication. Despite the revealed evidences of limited companies' endorsements of misleading green assertions, it could be suggested from the obtained results an existing evidence of a contextually determined tendency for the implementation of low-budget green marketing tactics among certain market participants, as well as an emerging trend towards cautious disclosure of sustainability-related actions (green hushing) in the face of anticipated new regulatory scrutiny. Overall in this study are outlined the ethical boundaries of companies' green assertions in Bulgarian tourism industry shaped under the joint influence of regulatory pressures, market dynamics and communication risks.*

Keywords: greenwashing, tourism, sustainable communication, regulatory framework, Bulgaria.

Introduction

Modern tourists are increasingly aware of the importance of their personal choices related to lifestyle, vacations as well as the characteristics and impact of the tourism services they consume. The rapid development of tourism consumption is gradually changing customers' expectations and attitudes, impacting both tourists and tourism companies in different ways. Many of these companies are committed to develop sustainable tourism products through green and

DOI: 10.2478/picbe-2026-0336
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environmentally-oriented initiatives. However, the theoretical aspects of this trend are often in conflict with the actual behavior of some tourism companies which falsely, excessively, or inaccurately present themselves as environmentally friendly. At the same time, these companies continue to use resources intensively without imposing restrictions on waste generation, greenhouse gas emissions or environmental pollution as a whole. These practices are associated with greenwashing strategies in which organizations declare that they are sufficiently sustainable without actually minimizing or controlling their impact on the environment and tourism resources. The greenwashing practices can be determined as misleading marketing communication tactics designed predominantly to gain trust of customers, who choose to support with consumption those organizations which are dedicated to climate adaptation and conservation of nature.

The main reason for the wide spread of greenwashing practices in the tourism industry is the current change in consumer behavior. Numerous studies suggest that younger generations (particularly Gen Z) are more likely to purchase products and services which are communicated by companies as ethical, sustainable and socially responsible. The Nielsen report (2015) on global corporate sustainability indicates that 66% of consumers are willing to spend more on products from sustainable brands and the figure even rises to 73% among millennials. The cited data suggest that businesses, including those in the tourism sector, are increasingly encouraged to adopt socially and environmentally responsible practices in response of changing consumer behavior.

The term "greenwashing" refers to "the act or practice of making a product, policy or activity appear to be more environmentally friendly or less environmentally damaging than it really is" (Merriam-Webster, 2026). On common basis, greenwashing occurs when companies emphasize or exaggerate their sustainability efforts instead of implementing meaningful actions to reduce their environmental impact. Such practices can lead to uncertainty and confusion regarding the authenticity of corporate environmental commitments, highlighting the need for greater transparency in green marketing communication (Szabo & Webster, 2021). Furthermore, Álvarez and Sureda (2023) argue that greenwashing rarely reflects real environmental responsibility of organizations. Rather, it is often driven by economic motives and supported through vague assertions for sustainability and misleading promotional messages. In this way, companies attempt to benefit from the growing consumer demand for sustainable products and services not only in the travel and tourism industry but also across many other economic sectors.

Due to the relevance of sustainable tourism development, the potential for consumer deception has become significant over the years. A study of the European Commission (2024) confirms these concerns, revealing that 53% of "green" claims are vague, misleading, or unfounded and that 40% are entirely unsubstantiated. There is a large number of sustainable ecolabels in the EU (230 voluntary ecolabels, 901 labeling schemes in the food area, 100 private green energy labels), with very different levels of transparency. Almost half of them offer little or no verification, and only 35% require specific data to demonstrate compliance with the criteria for sustainability (European Commission, 2022). Greenwashing hinders consumers from making informed and conscious choices and prevent truly sustainable companies from distinguishing themselves and gaining a competitive advantages. Ultimately, greenwashing undermines trust in the implementation of sustainable development in the tourism industry, increasing skepticism in both companies and customers. The circumstances resented above determine the relevance of the topic as well as the authors' interest in revealing the green and sustainable claims made by tourism companies. In this regard, the subject of this research corresponds to the main dimensions of greenwashing. The object of the study is the green and environmentally oriented initiatives of Bulgarian tourism companies, which currently operate in a context of rapid regulatory change and increasing sustainability-related obligations. In general, these companies may place too much

emphasis on sustainability-related claims in order to meet growing market demands, regulatory pressures and public expectations. Therefore, the purpose of this article is to explore the specific attitude towards potential greenwashing pitfalls among tourism companies in Bulgaria considering ethical dimensions and current trends in tourism sector. In order to this objective to be achieved, several research tasks were carried out, including examining the nature and characteristics of greenwashing, reviewing selected notable cases and relevant regulatory framework as well as exploring the attitudes of Bulgarian tourism companies towards this phenomenon.

Literature review

Greenwashing in hospitality in tourism industry

Nevertheless, that research on greenwashing in hospitality and tourism remains relatively limited, the understanding of this phenomenon is becoming increasingly important for the sustainable development of the industry. Existing studies commonly describe greenwashing as a discrepancy between companies' actual environmental performance and the environmental image or messages they communicate to the public (Wu et al., 2020; Yang et al., 2020; Du, 2015). A large share of the scientific literature also focuses on the influence of greenwashing on tourists' attitudes and behavior (Rahman et al., 2015; Phan et al., 2024). From the customers' point of view, greenwashing is commonly perceived as a gap between what companies claim about their environmental responsibility and what they actually do in practice.

Greenwashing has also been widely discussed in relation to corporate social responsibility (CSR). In this relation, Papagiannakis et al. (2024) examined 253 large tourism companies between 2004 and 2022. Using objective data from specialized global databases such as Refinitiv and Worldscope, the cited authors compared publicly communicated sustainability commitments with the companies' actual investments and actions. It is interesting that their findings do not support the assumption that large tourism companies systematically engage in greenwashing. On the contrary, many organizations appear to undertake more substantial sustainability actions than they publicly communicate, a phenomenon described as "green hushing". The commented study also revealed notable differences across tourism subsectors. Hotel and restaurant companies demonstrated stronger engagement in direct sustainability initiatives, while entertainment and leisure organizations showed lower levels of involvement. Tour operators, on the other hand were found to play a distinctive intermediary role within the tourism industry. Acting as professional "gatekeepers", they tend to view CSR as an important condition for building and maintaining relationships with suppliers. As a result, they carefully assess whether suppliers' sustainability claims correspond to their actual practices and may be penalized in cases where communication exceeds real environmental performance. Such inconsistencies are commonly interpreted as signs of greenwashing and weak organizational integrity. According to the study, companies associated with misleading "green" practices may also experience substantial declines in sales and consumer trust.

The growing emphasis on the Sustainable Development Goals (SDGs) in tourism, together with the increasing number of environmentally conscious consumers, has encouraged tourism businesses to communicate sustainability-related messages more actively. At the same time, implementing real "green" initiatives often requires significant investments in areas such as waste management and recycling, environmental restoration, energy efficiency and water resource conservation. Limited financial and human resources may therefore encourage some companies, particularly in the hospitality sector, to overstate or misrepresent their sustainability commitments as a way to meet market expectations (Makeed & Kim, 2023). Suleman et al. (2025) also highlight the availability of inconsistencies between sustainability awareness and the actual implementation

of green human resource management practices within organizations. According to Rahman et al. (2015), misleading environmental messages can negatively influence tourists and undermine trust in companies that genuinely invest in environmental responsibility. Similar effects are also observed among employees in tourism organizations, contributing to greater skepticism towards the implementation of "environmentally friendly" corporate policies (Elshaer et al., 2025).

Overall, existing studies suggest that the tourism ecosystem has received limited and uneven scholarly attention regarding attitudes towards and perceptions of greenwashing. The academic debate predominantly focuses on identifying and analyzing the phenomenon's impacts on individual stakeholders. As a result, it could be suggested that up today researches on greenwashing in tourism remain relatively fragmented and are still in an early stage of their development. These researches are represented by limited number of studies exploring interactions between different actors within the broader tourism system and adopting a multi-stakeholder perspective.

Greenwashing practices in the hospitality and tourism industry

The term "greenwashing" was first introduced in 1986 by the American ecologist and biologist Jay Westerveld in an essay criticizing the hypocrisy behind the popular "save the towel" hotel initiatives. The practice had originally appeared several years earlier at a hotel on the island of Fiji. In his publication "It All Comes Out in the Greenwash", Westerveld argued that the hotel management exaggerated the environmental benefits to create a positive environmental image. Data shows that the hotel in question was producing a considerable amount of waste, while there was no evidence of real sustainability efforts. The researcher concludes that the "save towel" message was launched primarily to save on laundry costs rather than to protect the environment. The term "greenwashing" refers to unethical practices were organizations invest time and financial resources to present themselves to customers and partners as sufficiently sustainable without minimizing activities and practices that harm the environment. TerraChoice (2010), an environmental marketing company, classifies the most commonly used techniques of misleading sustainability claims as the "seven sins" of greenwashing: hidden trade-offs; lack of proof; vagueness; irrelevance; false labels; the lesser of two evils; fibbing.

Some of the most notable examples of greenwashing in the travel and tourism industry involve airline advertising campaigns. For instance, Ryanair's claim to be the "lowest-emitting" airline was banned in the UK in 2020 due to insufficient evidence. This case illustrates misleading environmental claims that were not supported by verifiable evidence and were therefore considered inconsistent with any regulatory standards. Similarly, Delta Air Lines faced legal action in the United Stated in 2023 following allegations that its carbon neutrality claims were overstated and insufficiently proved.

Leading cruise companies, such as Carnival and MSC, are investing heavily in ships powered by liquefied natural gas (LNG). This allows them to advertise their ships as "green" and "clean". However, the main problem with LNG is the "methane slip". Methane is a greenhouse gas with a substantially higher global warming potential than CO_2. Presenting LNG-powered ships as "eco-friendly" is frequently cited in the literature as an example of the "lesser of two evils" approach to environmental communication. Similarly, The TUI Group emphasizes eliminating plastics straws and promoting recycling, which shift the focus towards marginal environmental measures while the core carbon-intensive activities of the company remain largely unchanged.

Many hotels and other accommodations use logos featuring green leaves and globes with the inscription "Eco-Friendly Certified". The problem is that these "certificates" are not issued by independent and officially recognized authorities such as the EU Ecolabel, Travel life or Green

Key. Instead, these labels are often self-declared marketing symbols rather than certifications issued by independent and accredited institutions. This practice corresponds to the use of false or self-created labels, as described in the greenwashing literature. Hotels often replace small bottles of cosmetics (soaps, shampoos, conditioners, etc.) with large dispensers to justify claims such as "plastic-free" or "zero waste". However, liquid cosmetics products often contain chemicals that are discharged directly into wastewater system. Thus, an exclusive focus on packaging reduction may obscure other environmental impacts, constituting a form of hidden trade-off.

In 2024, Dutch regulators required Booking.com to remove the "green leaf" symbol from its "Travel Sustainable" program. The symbol was used to designate hotels as sustainable, but the program lacked clearly defined and verifiable criteria which created a risk of misleading consumers about the establishments' actual sustainability performance.

In summary, the above stated cases refer to some of the major tourism companies that provide basic and complex tourism services and at the same time are market leaders in the specific tourist sector. Notably, the tourism sector lacks a universally recognized and independent certification system capable of consistently and objectively assessing sustainability claims across different subsectors. Ethical issues related to greenwashing include misleading of consumers, diversion of people attention from critical problems, creation of unfair competition and undermining trust in the tourism sector and environmentally friendly business efforts. A unified certification system is needed to guarantee the use of certain terms under clear and indisputable conditions. As Kundi and Ernszt (2024) noted, the certification criteria should be grouped according to specific sectors within the travel and tourism industry. Taken together, these examples illustrate that greenwashing in tourism most often emerge through selective disclosure, symbolic sustainability actions and ambiguous environmental claims rather than through direct false statements. This pattern highlights the structural nature of greenwashing in the travel and tourism industry and underscores the need for clear standards, independent verification and strict regulatory control.

Regulatory framework of greenwashing

Preventing and deterring deceptive green marketing undoubtedly requires an appropriate regulatory framework that defines precise rules and criteria. From a global perspective, the UN Tourism proposal for reliable, standardized indicators to measure sustainability in tourism is noteworthy (World Tourism Organization, 2023). The ESG Framework for Tourism Businesses project provides a sector-specific approach to the implementation and consistent reporting of sustainability indicators, encompassing their economic, environmental and social aspects. The WTTC's reports and analyses also provide businesses with guidance on measuring and managing their environmental impact. However, there are warnings about eroding trust in tourism companies due to greenwashing. The Net Zero Roadmap for Travel & Tourism (World Travel & Tourism Council, 2024) is a significant document that emphasizes the importance of transparent targets and data verification to mitigate the risk of deceptive "green" practices. In general, leading international organizations recognize the need for standards and criteria to reliably and transparently measure sustainability. These institutions also acknowledge the fragmented nature of reporting, limited data comparability, and the risk of greenwashing. Nevertheless, they avoid using the term "greenwashing" directly and do not publicly discuss the phenomenon.

In the European context, the primary regulation act is the Empowering Consumers for the Green Transition Directive (European Union, 2024). The document establishes new regulations to protect consumers from deceptive sustainability claims. The ECGT prohibits the use of claims such as "eco", "environmentally friendly", "climate neutral", "biodegradable" and "offsetting" unless

they are supported by accurate, real and verifiable evidence. According to the Directive, commonly stated claims that a product is green or sustainable require a verification of an accredited public authority or organization. These strict anti-greenwashing rules will come into action throughout the EU, including Bulgaria from September 2026. In 2023, the EC proposed a Green Claims Directive (European Commission, 2023). However, this Directive has been revised in order to be excluded from its scope the microenterprises on the territory of the Union. The goal is to reduce the administrative and bureaucratic burdens. These European regulations directly impact the marketing activities and claims of tourism companies, which must be enough clear and verifiable. The use of sustainability-related terms must be based on transparent data verification and accurate, unambiguous information. Without transparent data verification, such claims may be considered as a kind of greenwashing. The demand for evidence and transparency is growing, and these regulations pressure tourism companies to fulfill their sustainability promises.

At the national level, Bulgarian legislation does not explicitly address the possible existence of pseudo-ecological practices. However, it provides regulatory norms against misleading information, green claims and unfair commercial practices. The primary regulatory document is the Consumer Protection Act (2006), which establishes requirements for information disseminated by traders. According to this legal act, information about goods and services must be accurate, comprehensive, clear, and understandable. The law specifies the main types of misleading commercial practices. In the context of the ecological transition, the Consumer Protection Commission, a specialized state authority is empowered to ensure compliance with consumers' and tourists' rights regarding misleading claims about the eco advantages of goods and services (Council of the European Union, 2025). Considering the transposed EU rules and the applicable direct European regulation in Bulgaria, the requirements for tourism businesses have increased, aiming to justify their stated eco-claims. The Bulgarian institutions that are authorized to exercise such control have the ability to sanction misleading "green" claims. Overall, the literature frames greenwashing in tourism as a multidimensional phenomenon shaped by the interplay between consumer perceptions, corporate sustainability communications and regulatory frameworks. However, the existing research studies remain fragmented and offer limited insight into the way these dynamics interact within a specific national context. The present study addresses this gap by focusing on the Bulgarian tourism sector.

Methodology

As a result of the literature review it is evident that the nature of greenwashing is multidimensional and contextual in its qualitative characteristics. For that reason, a qualitative case study approach was preferred as particularly relevant for capturing specific stakeholder perceptions and ethical notions. In this study, the authors adopted an embedded single-case study design according to Yin (2018) in order to examine the levels of understanding and handling of current and potential greenwashing activities across different market participants of the Bulgarian tourism industry. This methodological design is considered as an appropriate research tool for the analysis of different business units viewed as internal interrelated subjects within a broader national tourism context. At the same time the embedded single-case study design is suitable for the provision of analytical depth of the research. The authors suggest that the current study is one of the first used case-based survey of expert attitudes towards the greenwashing status in Bulgarian tourism. The internal units of the survey include tourism businesses from the following areas: an autonomous seaside resort; city and holiday hotels; a tour operator of mass recreational tourism; a travel intermediary; a regional museum; and an airport managing company (operator). This set of internal units allows

for the completion of a comparative analysis of the researched characteristics across the involved representatives (interviewed experts) of the mentioned tourism subsectors which exert different impacts on the environment along with specific interactions with customers. In this way of thinking the current research is methodologically based on the application of a qualitative exploratory design by which the authors try to examine companies' attitudes and practices related to environmental responsibilities, greenwashing, spin marketing and green hushing evidences. Considering the ethical sensitivity of these categories, expert interviews were preferred as the main data collection methods. The interviews were conducted between October and December 2025. The empirical research was conducted in the following stages:

- Stage I: Conceptual framing and development of research categories. The first stage of the research consisted of an extensive review of the academic literature on greenwashing, green marketing ethics, spin marketing techniques, and emerging regulatory framework at EU level. According to the conducted literature review, five analytical categories were devised for the purpose of the field survey: 1. Environmental impact and green initiatives of companies; 2. Companies' attitudes towards regulatory frameworks; 3. Ethical flexibility of companies and their temptations for greenwashing; 4. Use of spin marketing techniques of companies; 5. Detection of green hushing evidences. The first four categories are related to the different dimensions of green washing, awhile the fifth one is focused on its opposite phenomenon – green hushing.
- Stage II: Design of the survey tool. A semi-structured interview as a questionnaire form was devised in relevance to the predefined research categories. The implemented instrument combines a five-point Likert scale (with 3 indicating a neutral position) along with opportunities for the provision of open-ended responses by the experts. By using this approach, the authors have the possibility to adjust the received statements and numerical assessments of the different respondents. At the same time, it is possible the shared opinions of respondents to be contextually interpreted in relevance to the researched topic.
- Stage III: Selection of respondents. The empirical data were obtained by intentional choosing of particular experts (senior managers) from key tourism sectors of hospitality industry, tour operation business, cultural tourism and air transport. The interviewed experts were representatives of hotel and restaurant businesses, passenger transport management, museum management, tour operator and travel agency activities. According to this intended selection of respondents the focus was put on economically significant tourism organizations operating in Bulgaria. The limited number of respondents is consistent with the exploratory and case-based nature of the current study, where the qualitative expert assessments are preferred as desired outcomes instead of statistically representative data.
- Stage IV: Data collection. Eight expert interviews were conducted farce-to-face using a two stage procedures. First, respondents provided their multiple-choice answers by giving numerical assessments on the sequence of the posed questions from the questionnaire form. Second, for additional clarification and explanation of respondents' assessments follow-up questions were used in an open conversation manner about discussed sustainability and ethical issues.
- Stage V: Data summarizing and evaluation procedure. Following the process of gathering data, the responses were summarized according to the five research categories and comparatively evaluated across the involved companies and business sectors. The obtained outcomes were subsequently discussed in the context of the existing theoretical concepts and regulatory developments.

The current study differs from the dominant methodological approaches in the existing literature both in terms of research design and analytical perspective. Previous studies on greenwashing in tourism have mainly relied on systematic and scoping reviews (Onur et al., 2026; Suleman et al., 2025; Yang et al., 2020), as well as quantitative empirical methods such as surveys (Du, 2015; Elshaer et al., 2025), quasi-experiments, and analyses of secondary company data (Papagiannakis et al., 2024). In contrast, this study adopts a qualitative embedded single-case approach in order to provide a deep and context-sensitive understanding of managerial attitudes and ethical interpretations related to greenwashing. Unlike previous studies that typically analyze the phenomenon from the perspective of different actors such as consumers, employees, or companies, the present study brings together different business units within a national tourism system. This allows for comparisons across interconnected tourism subsectors and reveals how perceptions and communication practices may differ within the same institutional and market environment. Furthermore, while quantitatively oriented studies often emphasize measurable behavioral outcomes and market impacts, this research focuses on the ethical flexibility, perceptions and communication strategies associated with greenwashing in a specific national context. Through its comparative and contextually grounded design, the study responds to the growing appeals in the scientific literature for more integrated research approaches which consider the national features, the evolving regulatory dynamics and the interactions among different tourism subsectors.

Results and discussions

The assessments presented in this section are interpretative and comparative in nature within the framework of the qualitative case study design in use. Therefore for the purpose of the current survey there is no application of statistical generalization beyond the specific context of the tourism businesses and experts involved in the study. Through the *first group* of the research, a kind of snapshots is taken about the current impact of tourism business on the environment and the implementation of green initiatives (Table 1, 2 and 3). The green efforts of companies were measured in the context of their relationships with customers.

Group I. Assessment of the company's business effects on the environment and challenges for the implementation of "green initiatives".

Companies from the hotel sector outline their most significant green achievements in the fields of waste and energy management systems, the reduction of use of plastics, food waste management and recycling. Similar characteristics share the representative of the airport sector. The tour operator, the travel agent and the museums respondent still do not give high priority for achieving green policies towards their customers (Table 1).

The representatives from the seaside resort and the city hotel share opinions for high awareness and responsibility of the released environmental impact as a result of their business activities. These companies give high value of the impact they produce in terms of significance, strength and direction (Table 2).

Most of the interviewed experts (expert for the hotel chain) find out that high implementation cost and increased administrative burden are major impediments for the development of environmentally friendly practices in their business activities. The next significant difficulty which they point out in question stems from the lack of support and incentives from public authorities. Only the airport operator shows some levels of indifference about receiving support from public authorities.

Table 1. Importance of company's "green achievements" to customers

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Waste management systems	**5**	**5**	**5**	**4**	**4**	**1**	**3**	**5**
Reducing the use of plastics	**5**	**5**	**5**	**4**	**5**	**1**	**2**	**4**
Energy management systems	**5**	**5**	**4**	**2**	**3**	**1**	**4**	**3**
Water management systems	**4**	**5**	**4**	**2**	**3**	**1**	**4**	**4**
Increasing the share of green energy	**5**	**3**	**3**	**3**	**3**	**1**	**2**	**5**
Reducing food waste	**5**	**5**	**4**	**3**	**5**	**1**	**3**	**4**
Composting	**5**	**3**	**3**	**1**	**1**	**1**	**3**	**4**
Recycling	**5**	**5**	**4**	**5**	**1**	**1**	**3**	**5**
Deliveries of local products from local partners	**4**	**5**	**4**	**2**	**3**	**1**	**4**	**5**

Source: Authors' own research.

(1 = low level; 5 = high level)

AR = seaside holiday resort; TB = tour operator for mass recreational tourism; GH = seaside holiday hotel chain; BT = tour operator & travel agent; GG = city hotel; RM = regional museum; AT = seaside holiday hotel; FP = airport operator.

Table 2. Environmental impact assessment of the company's business

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Significance of the impacts	**5**	**4**	**5**	**2**	**3**	**5**	**5**	**4**
Strength of the impact	**5**	**2**	**5**	**3**	**3**	**3**	**2**	**4**
Direction on the impact	**4**	**3**	**4**	**4**	**3**	**3**	**3**	**5**

Source: Authors' own research.

(1 = low level / negative; 5 = high level / positive)

Table 3. Challenges to the implementation of green initiatives in the company's business

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
High implementation costs of green and environmentally friendly practices	**5**	**1**	**5**	**4**	**4**	**5**	**5**	**4**
Increased administrative burden on business activities	**4**	**1**	**4**	**4**	**4**	**5**	**5**	**3**
Customers do not have such initiatives	**1**	**1**	**1**	**3**	**2**	**3**	**4**	**4**
Lack of customer awareness of such initiatives	**1**	**2**	**1**	**5**	**2**	**3**	**4**	**4**
Lack of support from public authorities	**5**	**4**	**4**	**5**	**4**	**1**	**5**	**3**
Lack of incentives from public authorities	**5**	**4**	**4**	**5**	**5**	**4**	**5**	**3**

Source: Authors' own research.

(1 = low level / strongly disagree; 5 = high level / strongly agree)

The *second group* of research questions is aimed at measuring companies' attitudes toward coping with potential regulatory challenges in their relationships with clients regarding the green practices at hand (Table 4). The main question here is whether managers perceived EU regulations as a useful measure for "cleansing" the market of unscrupulous traders with misleading green claims, or rather as unpleasant burdensome barberries for tourism business.

Group II. Assessment of corporate attitudes towards the current regulations and ethical flexibility of tourism companies.

Almost all of the interviewed respondents stand for the implementation of strict regulations for assessments of the environmental impact of tourism industry. Generally, the researched companies are not worried that EU regulations on misleading environmental claims may incur additional administrative burden or constraints on their business activities, the representatives of the hotel sector, the regional museum and the travel agent consider that tourists have their reasons to doubt companies' claims of "green" practices regarded as typically communicated media hype.

Table 4. European regulations initiatives for the company's clients

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Company's support for the implementation of strict regulations for the assessment of the environmental impact of tourism industry	**5**	**3**	**5**	**5**	**5**	**5**	**5**	**5**
EU regulations on misleading environmental claims pose difficulties on the company's business	**1**	**1**	**5**	**4**	**1**	**1**	**3**	**1**
Company's evaluation of EU regulations on consumers rights in relation to misleading eco and green claims	**4**	**2**	**3**	**2**	**3**	**3**	**5**	**4**
The new EU regulations will increase the administrative burden on tourism industry rather than deliver environmental benefits	**3**	**3**	**3**	**4**	**4**	**3**	**3**	**4**
The new EU regulations on environmental sustainability are expected to impose constraints on the company's marketing activities	**1**	**2**	**3**	**2**	**4**	**1**	**2**	**3**
Tourist have reason to doubt companies' claim of "green" practices	**4**	**4**	**4**	**5**	**1**	**5**	**4**	**2**

Source: Authors' own research.

(1 = low level / strongly disagree; 5 = high level / strongly agree)

The *third research* category is divided into 3 subgroups of thematic questions about:

- Assessment of companies' statement based on the ethical dilemma: when managers believe that customers do not reward real sustainability, the incentives form undertaking green washing or cheap green marketing actions look much appealing than the drive for making genuine investment in environmental responsibility (Table 5).
- Measurement of companies' attitudes as to whether the definition of "green" is seen by them as merely a marketing tool or as e real operational objectives form achieving sustainability. High agreement on the posed questions indicates a dismissive company's attitude towards the nation of sustainability. The respondents' perceptions about potential greenwashing practices are also measured. In this manner if greenwashing is perceived as easy form implementation, it is likely to be practiced frequently (Table 6).
- Measurement of ethical questions designed to test whether the company's financial needs can lead to the justification of misleading actions, deceptive behavior or lying to the customer. Here are also tested statement related to the essence of the ethical compromise involved in the companies' possible engagement in greenwashing (Table 7).

Group III. Evaluation of market pressure as a primary driver of greenwashing practices among tourism companies. The findings in this group are to be interpreted as a reflection of certain managerial perceptions, attitudes, and ethical tolerance toward practices associated with greenwashing rather than a description and generalization of any type of organizational behavior. Almost all of the interviewed experts share beliefs that customers are more likely to consider the price benefits of tourism services they receive as more important in comparison to the real environmental impact they incur for the society. Except the tour operator for mass recreational tourist all other respondents do not support the suggestion that their companies may become more profitable when appear green and eco-friendly instead of making investments in sustainability issues (Table 5).

Most of the researched companies (expect for the tour operator form mass recreational tourism) do not back up the statement that green marketing has substantial importance in their business for the attraction of new customers instead for the reduction of the environmental impact. Considering the given answers on the second question in the table 6 it can be presumed that for the

representatives of the seaside hotel, the tour operator and the regional museum green marketing seems as a real option instead of making substantial investments in sustainability.

Table 5. Detection of greenwashing perceptions of company in relation with its customers

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Costumers are more concerned with the price of the tourism services offered by the company than with their real environmental impact	**4**	**3**	**4**	**5**	**5**	**5**	**5**	**5**
It's more profitable for the company to appear green and eco-friendly than to actually invest in sustainability	**2**	**2**	**1**	**1**	**4**	**1**	**2**	**1**

Source: Authors' own research.

(1 = strongly disagree; 5 = strongly agree)

Table 6. Company's attitudes towards the implementation of green marketing in its business

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Green marketing is more important for attracting new customers than for reducing the environmental impact of your business	**2**	**2**	**3**	**2**	**5**	**1**	**2**	**1**
It is easier for your company to practice green marketing than to make substantial investment in sustainability	**2**	**3**	**3**	**5**	**4**	**3**	**4**	**1**

Source: Authors' own research.

(1 = strongly disagree / very easy; 5 = strongly agree / very difficult)

Table 7. Ethical aspects of the company's approach for undertaking green marketing initiatives

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
The use of vague green and eco claims is an acceptable marketing approach that aids the company's financial survival	**1**	**1**	**1**	**4**	**4**	**1**	**3**	**1**
The use of exaggerated green and eco claims is an acceptable marketing approach that aids the company's financial survival	**1**	**4**	**1**	**5**	**4**	**1**	**2**	**1**

Source: Authors' own research.

(1 = strongly disagree; 5 = strongly agree)

The seaside hotelier and the tour operator are the only two respondents supporting the idea of using vague or exaggerated green and eco claims in the name of their financial survival (Table 7).

The *fourth group* of research questions is dedicated to the potential use of certain spin marketing techniques for the implementation of green and eco initiatives of the companies. For the purpose of this study are actually researched 4 types of spin marketing tools such as:

- *Framing* – the way the information at hand is presented to the audience;
- *Gaslighting* – psychological manipulation of the audience by questioning their perception of reality;
- *Truthiness* – a preferred half-truth (based on selected facts in convenience) that has to be imposed to the audience as the only one kind of truth;
- *Exaggeration* – representation of things to the audience in an excessive manner.

Group IV. Evaluation of the company's attitudes towards the use of spin marketing activities.

Within the framework of this study, the attempt to detect the availability of spin marketing in use is based on the critical interpretation of expressed communication approaches and varying levels of ethical acceptability by the interviewed experts rather than as confirmed forms of intentional manipulation. The propensity of framing with the researched companies is mostly visible for the marketing communication of the seaside resort and the airport operator. The most popular phrases for framing a green massage are "circular economy" and "carbon footprint" (Table 8).

Except for the seaside hotel chain, the rest of the interviewed respondent are actually tempted to do some gaslighting actions in certain areas mostly expected in the business of the tour operator, the travel agent and the airport operator. The public call for actins for the resolution of a green problem and the instigation of relevant and social responsibility to it seem to be the mostly preferred instrument for potential gaslighting actions of the companies (Table 9).

Table 8. Company's attitude towards the use of green and eco phrases in its communication policy (Contextual conditions for Framing):

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Climate change	**5**	**2**	**2**	**4**	**4**	**1**	**2**	**5**
Business climate adaptation actions	**5**	**2**	**4**	**1**	**2**	**2**	**3**	**5**
Global warming	**4**	**4**	**4**	**4**	**5**	**1**	**2**	**5**
Circular Economy	**5**	**5**	**5**	**3**	**2**	**1**	**2**	**4**
Carbon Footprint / Carbon Emissions	**5**	**4**	**5**	**5**	**2**	**1**	**2**	**4**
Zero waste	**5**	**2**	**4**	**5**	**4**	**1**	**4**	**3**
Carbon credits / carbon allowance	**2**	**2**	**3**	**2**	**3**	**1**	**3**	**1**

Source: Authors' own research.

(1 = low level; 5 = high level)

Table 9. Company's readiness to act when identifying a problem based on green and eco massages (Contextual conditions for Gaslighting):

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
To publicly disclose the source of the problem	**3**	**3**	**3**	**2**	**5**	**5**	**4**	**5**
To publicly announce the relevant decision	**4**	**3**	**4**	**4**	**5**	**5**	**3**	**5**
To publicly call for actions for the resolution of problem	**4**	**3**	**5**	**5**	**5**	**5**	**3**	**5**
To instigate undertaking of legal and social responsibility	**5**	**4**	**5**	**5**	**3**	**5**	**4**	**4**

Source: Authors' own research.

(1 = strongly disagree; 5 = strongly agree)

All of the researched companies' respondents declare zero tolerance or at least indifferent notions on the opportunity to present and support publicly a half-truth about certain aspects of their business. For instance such a half-truth based on selected facts or use of knowledge in convenience reflects the "scientific statements" about "the closing of the ozone holes" or the "cyclical character" of the global warming (Table 10).

The researched tour operator, travel agent and the holiday seaside resort are most likely to engage in a marketing spin exaggeration. Those companies share that don't feel worries about undertaking such activities towards their customers or the society as a whole (Table 11).

Table 10. Company's readiness to focus on arguments about its green and eco responsibility (Contextual conditions for "Truthiness"):

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
On limited information and data provided selectively for convenience	1	2	1	3	3	1	2	2

Source: Authors' own research.

(1 = strongly disagree; 5 = strongly agree)

Table 11. Company's readiness to make green and eco statements in an excessive manner (Contextual conditions for Exaggerating):

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
To consistently highlights the green practices of its business	4	4	4	4	5	1	3	3
To achieve business uniqueness through green and eco practices	5	4	4	5	5	1	5	4
To lead and drive sustainable development in its industry through green and eco practices	5	4	5	5	4	3	2	5
To offer eco value to its customers in exchange for higher-priced services	5	4	5	5	5	1	5	2

Source: Authors' own research.

(1 = low level; 5 = high level)

Table 12. Company's reluctance to publically announce its goals due to concerns about failing to achieve them and facing criticism from:

Indicators	AR	GH	GG	AT	TB	BT	RM	FP
Tourists / Visitors	4	4	5	5	4	1	5	3
Collaborators	3	4	1	1	4	1	3	3
Competing companies	5	2	5	1	4	1	4	3
Public institutions	3	4	4	5	4	1	5	2
Non-profit organizations	5	4	3	1	2	1	5	2
The general public	4	4	5	4	5	1	5	2

Source: Authors' own research.

(1 = strongly disagree; 5 = strongly agree)

Group V. Identification of "green hushing" practices within the company.

The fifth research category is about testing the general presumption of existing green evidence in the companies' business. The regional history museums and partially the sity hotel seem to have the highest levels of green hushing presence according to the researched elements (Table 12). The stringent regulatory rule of the EU Directive ESGT (2024) which is to enter into force in September 2026 are expected additionally to influence companies towards a more conservative approach for the announcement of their green practices in public. The fear of having non-compliance with this Directive and the exposition to possible legal sanctions makes the researched companies to keep their green practices and initiatives away from the public attention.

Conclusion

The phenomenon of greenwashing and the attitudes of Bulgarian tourism companies toward similar practices represent a complex and multifaceted problem. This is confirmed by the ethical aspects analyzed in this study, which employs an exploratory qualitative research design. The focus is placed on identification of motivational factors, perceptions, and contextual drivers of greenwashing-related behavior rather than on reporting explicit cases. The results from the research do not indicate the existence of any common, systematic or intentional greenwashing practices in

use by tourism organizations. On the other hand, it's evident from the research that certain types of "green ethics" of companies combined with specific marketing communication strategies are used in the Bulgarian tourism sector which looks as a premise for a superficial green marketing in use. Following this in mind Bulgarian tourism enterprises and more particularly those which are focused on sustainability approach are exposed to additional regulatory and reputational risks. This in turn impacts the marketing communication strategies of companies and their willingness to publicly disclose environmental practices. The current research can therefore be regarded as a pioneer attempt for the reveal of existent greenwashing activities and contextual environment in the Bulgarian tourism industry. As a conclusion, it could be stated that the existence of a considerable market pressure and outstanding price sensitivity among tourists as customers indicate the diminishing willingness of companies to undertake further investments in sustainability. At the same time, the increase of monitoring and regulatory control of public institutions would lead to more conserved marketing communication of companies which in turn is expected to additionally reinforce tendencies towards *green hushing.* According to the findings, from a policy perspective in the Bulgarian tourism context, regulatory efforts should be elaborated to curb misleading green claims complemented by apt incentives and clear communication guidelines. These measures are indispensable for the stimulation of real investment in sustainability along with activities for diminishing the risks of green washing and green hushing.

The present study has several research limitations. As a qualitative exploratory study involving a limited number of expert respondents, its findings should not be generalized to the entire tourism sector in Bulgaria. Furthermore, the assessment relies on self-reported managerial perceptions, which may be affected by subjectivity particularly in relation to ethically sensitive issues such as pseudo-ecological practices, greenwashing and spin marketing. To partially address this limitation, terms directly related to greenwashing and spin marketing were intentionally omitted in the questionnaires and the following interviews. Moreover, the analysis highlights some specific sectoral characteristics of tourism and does not aim to provide a comprehensive cross-industry comparison. Future research studies could be based on the current scientific concept revealed here in several important directions by: expanding the research sample considering its type and size; integrating quantitative data from tourism businesses and tourists as customers; analyzing the impact of evolving EU sustainability regulations on corporate communication strategies.

Further research could also focus on the targeted processes of monitoring and analysis of the affect of EU sustainability regulations over corporate communication strategies in the tourism sector in the long run. Particular attention should be paid to the dynamics and interaction between greenwashing practices and real sustainability efforts. Research studies could be additionally focused on the survey of specific characteristics and behavioral patterns associated with the highly competitive environment in the hospitality and tourism industry. In this context, it is important to evaluate how regulations, including the risk of litigation, may stimulate more realistic and responsible actions to promote the balanced development of the tourism industry in Bulgaria. Additionally, scientific researches could be dedicated to the examination of the barriers and threats due to greenwashing practices which in turn can influence the achievement of the global Sustainable Development Goals (SDGs).

Acknowledgments

During the preparation of this study, the authors used GPT-5.5 (OpenAI) for the purposes of linguistic and stylistic fine tuning of the text. The authors have reviewed and edited the output and take full responsibility for the content of this publication.

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