

# “Go Green, Go Paperless” Messages Are Misleading

## The Facts About Greenwashing



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Consumers are increasingly aware of the impact their choices have on the environment and are influenced by environmental claims made by trusted organizations. But such claims are not always based in fact. Greenwashing is defined as “disinformation disseminated by an organization so as to present an environmentally responsible public image” (Oxford Dictionary) or “behavior or activities that make people believe that a company is doing more to protect the environment than it really is” (Cambridge Dictionary).

Many leading companies are urging their customers to go paperless with broad, unsubstantiated claims that suggest paperless bills, statements and other electronic communications are better for the environment. These types of statements are **greenwashing**: They are not specific, not supported by reliable scientific evidence or life cycle assessment and are misleading because they imply that electronic communication always has less effect on the environment than printed materials.

### Examples of greenwashing:

1. Go paperless, save trees!
2. Sign up for paperless billing and help the environment.
3. Help us lower our carbon footprint and yours - sign up for paperless billing.

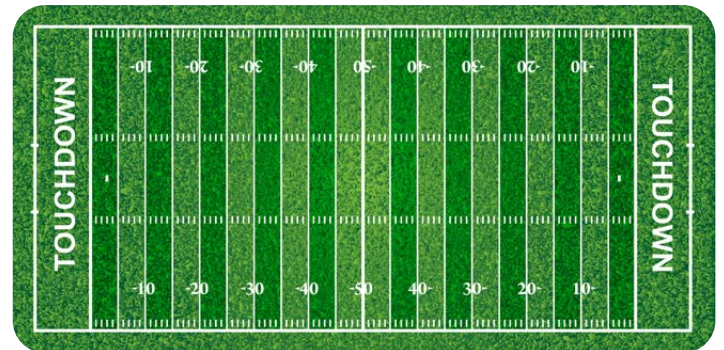
### Greenwashing costs family-supporting jobs!

Companies that make these types unsubstantiated environmental claims not only mislead consumers – they pose a serious threat to the economic security of more than 7 million men and women in the North American paper, printing and mailing sector whose livelihoods depend on paper.

A 2022 study by Two Sides North America and global research firm Censuswide found that 65% of American consumers who have seen anti-paper greenwashing messages from their service providers were influenced to switch from paper bills and statements to electronic communication.

### Myth – Going paperless saves trees and stops deforestation

Contrary to the idea that using paper destroys forests, strong demand for sustainably sourced paper provides a powerful financial incentive for forest owners to manage their land responsibly and keep it forested instead of selling it or permanently converting it to non-forest uses, which is the very definition of deforestation.



In North America, we grow many more trees that we harvest. Net forest area in the United States increased by approximately 18 million acres between 1990 and 2020, an area equivalent to around 1,200 NFL football fields every day. Canada’s net forest area was quite stable at approximately 900 million acres from 1990-2022. The areas of the world that consume the least wood continue to experience the greatest forest loss. (UN Forest and Agriculture Organization (FAO), 2020).

### Papermaking is an inherently sustainable process

In addition to being the most recycled material in North America, paper is a material whose industry sustainably grows and regrows its own raw material (wood fiber from trees), derives most of the energy to drive its processes from renewable carbon neutral biofuel, and cleans and returns more than 90% of the water it uses to the environment, with the rest evaporating or remaining in the paper products.

The miniaturization of today’s electronic devices and the ‘invisible’ nature of digital infrastructure and cloud-based services cause many to vastly underestimate the environmental footprint of electronic communication, which includes the environmentally intensive mining of finite raw materials like iron, copper and rare earth minerals to produce electronic devices, massive amounts of predominately fossil fuel energy used to manufacture and operate those devices and the server farms that support them, and the enormous and growing amount of e-waste generated.

## Myth – Paper is wasteful and bad for the environment

Contrary to the idea that paper products are wasteful, they are recycled more than any other material in the United States (U.S. Environmental Protection Agency). The U.S. recovers 68% of its paper products for recycling, and that number jumps to 94% for cardboard boxes (American Forest and Paper Association, 2022).

**68% of paper is recycled in the United States**

The United States is close to the maximum achievable paper recovery rate because some paper products are permanently removed from the fiber cycle and cannot be recovered, including hygiene products, medical supplies and items that are stored for long periods of time such as books and archived records.

Some suggest that only recycled fiber should be used to manufacture paper products, but that's a practical impossibility. Every time paper is recycled, the fibers get shorter and weaker. After being recycled 5 to 7 times, the fibers become too weak to bond into new paper. Fresh wood fiber must be continually introduced into the system to sustain paper production and retain the strength and quality of the overall fiber supply.

Mills using fresh wood fiber use different processes than mills using recycled fiber. As a result, releases to the environment differ. Recycled fiber production can result in higher or lower releases to the environment than fresh fiber production depending on the type of release, the product manufactured and the type of fuel used. For example, fresh fiber production and processing usually requires more energy than recycled fiber processing, but it relies primarily on renewable, carbon-neutral fuel. Recycled fiber processing uses mostly fossil fuels, resulting in higher greenhouse gas emissions.

The benefits of paper recycling include extending the supply of a valuable natural resources (wood fiber), saving landfill space and avoiding greenhouse gas emissions (methane) released when paper decomposes in landfills.

**Recycling 1 ton of paper saves 3.3 cubic yards of landfill space.**



**The pulp and paper sector is one of the lowest industrial emitters of greenhouse gasses, accounting for only 1% of total emissions in the United States (U.S EPA, 2022).**



## Myth – Electronic communication is better for the environment than paper-based communication

Electronic communication has a vast and growing environmental footprint.

By 2028, North America is estimated to have over 500 million internet users, up from 400 million in 2020. (Statista, 2023)

The energy consumption required for digital technologies is increasing by 6% each year. The digital sector makes up a significant portion of global emissions (~35% in 2021). The demand for raw materials such as critical and rare earth minerals is also growing. (The Shift Project, 2021)

Previous calculations of Internet & Communications Technology's (ICT) share of global greenhouse emissions, estimated at 1.8-2.8%, likely fall short of the sector's real climate impact as they only show a partial picture. These prior estimates do not account for the full life cycle and supply chain of ICT products and infrastructure, such as the energy expended in manufacturing the products and equipment; the carbon cost associated with all of their components and the operational carbon footprint of the companies behind them; the energy consumed when using the equipment; and also their disposal after they have fulfilled their purpose. ICT's true proportion of global greenhouse gas emissions could be around 2.1-3.9%, which are greater than those of the aviation industry, which are around 2% of global emissions. (Science Direct, 2021)

The U.S. and Canada annually generate 7.9 million metric tons (Mt) of electronic waste or 21 kilograms (kg) per capita. Of that 7.9 Mt, the U.S. generates 7.2 Mt and Canada generates 0.7 Mt. 52% of e-waste in North America is recycled, but globally it is closer to 22%. (Global e-waste Monitor, 2024)

Most e-waste is managed outside formal collection and recycling schemes. This has a direct and severe impact on the environment and people's health. (Global E-Waste Monitor, 2024)

## Misleading environmental claims fall short of U.S. FTC and ISO 14021 standards

Without competent and reliable scientific evidence documenting the net environmental benefits of electronic services versus print and paper, environmental claims can mislead consumers, and they fall short of established environmental marketing standards.

### U.S. Federal Trade Commission Guides for the Use of Environmental Marketing Claims

**Section 260.2** - Marketers must ensure that all reasonable interpretations of their claims are truthful, not misleading, and supported by a reasonable basis before they make the claims. In the context of environmental marketing claims, a reasonable basis requires competent and reliable scientific evidence. Such evidence consists of tests, analyses, research, or studies that have been conducted and evaluated in an objective manner by qualified persons and are generally accepted in the profession to yield accurate and reliable results. Such evidence should be sufficient in quality and quantity based on standards generally accepted in the relevant scientific fields, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that each of the marketing claims is true.

**Section 260.4** - It is deceptive to misrepresent, directly or by implication, that a product, package, or service offers a general environmental benefit. Unqualified general environmental benefit claims are difficult to interpret and likely convey a wide range of meanings. In many cases, such claims likely convey that the product, package, or service has specific and far-reaching environmental benefits and may convey that the item or service has no negative environmental impact. Because it is highly unlikely that marketers can substantiate all reasonable interpretations of these claims, marketers should not make unqualified general environmental benefit claims.

### ISO 14021 requirements for self-declared environmental claims

- A self-declared environmental claim shall be specific as to the environmental aspect or environmental improvement which is claimed. An environmental claim that is vague or non-specific or which broadly implies that a product is environmentally beneficial or environmentally benign shall not be used. Therefore, terms such as environmentally friendly, eco-friendly, green, non-polluting or nature friendly should not be used.
- A self-declared environmental claim shall be: accurate and not misleading; substantiated and verified; relevant to that particular product, and used only in an appropriate context or setting; presented in a manner that clearly indicates whether the claim applies to the complete product, or only to a component part or packaging, or to an element of a service.
- The use of natural objects (trees, the globe, leaves), shall not be used unless there is a direct and verifiable link between the object and the benefit claimed.

## Which is better for the environment – print on paper or digital communication?

The simple answer is that both have environmental impacts. A comprehensive, science-based life cycle assessment (LCA) that conforms to the internationally recognized ISO 14040 standard for LCA studies is the only way to determine what those impacts truly are.

ISO defines LCA as a compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product throughout its life cycle. A study that conforms with ISO standards carefully defines the specific products that are being compared and what they are designed to do, and sets specific study boundaries around those products. For example, among other things, the LCA for a paper billing statement would evaluate data from the specific mill that manufactured the paper - raw materials, chemicals, water and energy consumption, type of energy used, greenhouse gas emissions released and so on. With this level of specificity, what's true for one paper product is highly unlikely to be true for another.

ISO conformance also requires that an LCA undergoes an independent critical review by a third-party panel of three experts whose job it is to examine and comment on the integrity of the study at various stages in the process.

Because LCA evaluations can be costly and time-consuming, some companies resort to using generic online environmental calculators to try to validate their claims that electronic billing and other types of digital customer communications are better for the environment than print on paper. Such online calculators are typically free, user friendly and deliver immediate results. But unlike LCAs, which evaluate product-specific data, online calculators use generic data and overly broad assumptions that lead to questionable results and misleading environmental claims – greenwashing.

**A self-declared environmental claim shall be accurate and not misleading, substantiated and verified, relevant to that particular product, and used only in an appropriate context or setting. ~ ISO 14021**



## The right to choose

Some companies are defaulting consumers to online communication, without a choice, to reduce costs. It's important that banks, utilities, telecom companies and other service providers understand that for many Americans, printed communication is not a choice – it's a necessity. A 2024 study by Broadband Now reported that more than 42 million Americans do not have broadband internet access. In addition, many who have access to internet service cannot afford it. Consumers in rural areas without broadband infrastructure and many among our most vulnerable populations – older Americans, those with disabilities and low-income individuals – depend solely on printed bills, statements and other important communications.

A 2023 survey of American consumers commissioned by Two Sides and conducted by international research firm Toluna showed that:

**81%** Believe they should have the right to choose how they receive communications (printed or electronically) from financial organizations and service providers

**65%** Are concerned that digital overuse could be harmful to their health.

**65%** Are concerned with online security - that personal information held electronically is at risk of being hacked or stolen

Socially responsible companies should not deny the right of consumers to choose how they receive important communications – on paper or electronically – and should not implement surcharges or make it difficult for consumers to receive paper communications.

## Why avoid greenwashing?

1. Greenwashing, the use of environmental claims that are vague and not backed by competent and reliable scientific evidence, violates environmental marketing standards established by the U.S. Federal Trade Commission, the Canadian Competition Bureau/Canadian Standards Association, the International Organization for Standardization (ISO 14021) and the United Nations Environment Program.
2. Greenwashing distracts from a company's legitimate environmental initiatives and can damage corporate reputation when misleading claims are exposed.
3. Respected companies that use unsubstantiated environmental claims have a damaging effect on consumer perceptions of paper and put at risk the livelihoods of more than 2 million people in the North American paper, printing and mail sector.

Two Sides welcomes the opportunity to speak with any organization that is interested in making well-informed decisions and assuring that its environmental marketing claims related to print on paper are supported by the facts.






## About Two Sides North America


Two Sides North America is part of the non-profit Two Sides global network which includes more than 600 member companies across North America, South America, Europe, Australia and South Africa. Our member companies span the Graphic Communications and Paper-based Packaging value chain, including forestry, pulp, paper, paper-based packaging, chemicals and inks, pre-press, press, finishing, printing, publishing, envelopes and postal operations.


Our mission is to dispel common environmental misconceptions and to educate businesses and consumers with engaging factual information about the environmental sustainability and value of print, paper and paper-based packaging.


For more information visit [www.twosidesna.org](http://www.twosidesna.org).


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Print, Paper and  
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have a great  
environmental  
story to tell

