Self-Declared Environmental Marketing Claims: The Do's and Don'ts

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Self-declared environmental marketing claims *should be:*

Accurate and not misleading

Example: A paper product that contains 100% recycled content may be represented as recycled, but if a lesser percentage of content is recycled, that percentage should be specified.

Substantiated and Verified

Example A: A reference to a product made by a facility that has a certified ISO 14001 environmental management system, as long as the facility can provide evidence.

Example B: A magazine that switches to a lightweight paper and claims to have a reduced carbon footprint as a result must have competent and reliable scientific evidence (tests, analyses, research or studies that have been conducted and evaluated in an objective manner by qualified persons) to substantiate this claim.

Self-declared environmental marketing claims *should be:*

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

Example: A direct mail piece that says 100% recycled on the outside of the envelope is misleading if the envelope and its entire contents are not 100% recycled. It the latter is true, this statement should be clarified or not used.

Specific to the environmental aspect or environmental improvement claimed

Example: Claims that are vague or non-specific or which broadly implies that a product is environmentally beneficial or environmentally benign should not be used. These include terms like green, environmentally friendly and environmentally safe.

Self-declared environmental marketing claims *should be:*

- **Presented in a manner which does not imply that the product is endorsed or certified by an independent third-party organization when it is not. Certificates or official looking symbols should be accompanied by information indicating on which standards they are based, who issued them and what certification procedure was used.**

  Example: A company that internally creates its own official looking environmental on-product logo must clearly indicate that the logo represents internal standards, not those of a third-party certification body, even if there is clear substantiation of the company's internal processes to supporting criteria for the logo.

- **Related to an environmental aspect that either exists or is likely to exist during the life of the product**

  Example: It would be misleading to claim that no wood from tropical mahogany trees was used in the production of a certain paper product since such wood is never used in paper production.

Self-declared environmental marketing claims *should be:*

Relevant to the area where the product's corresponding environmental impact occurs

Example: Marketers should qualify compostable claims if the product can't be composted at home safely or in a timely way. Marketers also should qualify a claim that a product can be composted in a municipal or institutional facility if such facilities aren't available to a substantial majority of consumers.

Include a basis for comparison if it is compared with other products or with previous versions of the same product

Example: It would be wrong to claim that a product is now more energy efficient with no further specification. However, it would be acceptable to state that the product's energy consumption is 20% lower than that of a previous version of the same product.

Self-declared environmental marketing claims *should not:*

Be misleading

Example: It is misleading to claim that a paper product contains twice as much recycled content as before, if the original recycled content was very low. The difference should be given in absolute numbers, i.e. for an increase from 15% to 20% as an increase of 5%, and not a 50% increase.

Make broad, unqualified general environmental benefit claims like "green" or "eco-friendly." Broad claims are difficult to substantiate, if not impossible.

Example: A claim that electronically delivered documents are more eco-friendly than documents printed on paper is deceptive unless there is competent and reliable scientific evidence (tests, analyses, research or studies that have been conducted and evaluated in an objective manner by qualified persons) to support such a claim.

Self-declared environmental marketing claims *should not*:

Exaggerate the significance of the product's environmental impact related to the claim

Example: A marketer states that its packaging is now "Greener than our previous packaging." The packaging weighs 15% less than previous packaging, but it is not recyclable nor has it been improved in any other material respect. The claim is deceptive because reasonable consumers likely would interpret "Greener" in this context to mean that other significant environmental aspects of the packaging also are improved over previous packaging. A claim stating "Greener than our previous packaging" accompanied by clear and prominent language such as, "We've reduced the weight of our packaging by 15%," would not be deceptive, provided that reducing the packaging's weight makes the product more environmentally beneficial overall and the advertisement's context does not imply other deceptive claims.

Use natural objects (ex: trees, birds, forest, the globe), unless there is a direct and verifiable link between the object and the benefit claimed

Example: Using images of trees with a claim that electronic communications are more eco-friendly could be misleading because it implies a direct and verifiable link between using electronic communications and protecting forests.

For more information on the do's and don'ts of self-declared environmental marketing claims contact:

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