

## **Environmental claims in advertising: a guide for advertisers**

It is impossible to operate in business today without acknowledging the importance of environmental concerns. This document is not a treatise on climate change, nor is it a stern warning to advertisers to “go green”; it is simply designed to help advertisers consider the issues when contemplating making any environment-based claims about their company or their products in their advertising.

Although it is necessary to deal with environmental claims, as this is what the codes governing advertising and marketing cover, the principles outlined later in this document should be read as also applying to claims made about sustainable or ethical practices.

It is fair to say that while consumers’ awareness of ethical and environmental issues is increasing so are the threats to their faith in advertising, and this is why caution and considered decision making are imperative in this area. The principles below should help advertisers ensure that any claims made fall within the self-regulatory codes, and avoid negative PR and accusations of “greenwashing”.

Before embarking on an environmental project of any kind it is important to define and understand your organisation’s over-arching policy in order to deliver a consistent approach across the board. This policy should extend to your suppliers, especially those agencies tasked with communicating the message. If everybody within your organisation, or working closely with it, fully understands what it is you are trying to achieve, this will substantially reduce the risk of a confused message, and raise the effectiveness of your communications.

### **The codes**

The principles below draw heavily on both the self-regulatory CAP and BCAP codes, and the Government’s environmental claims advice issued by the DTI and DETR in 2000 (now known as DeBERR and Defra). The issue of false environmental claims is not a new one, and the current CAP guidelines are direct descendants of rules put in place in the early 1990s to deal with environmental claims and packaging issues.

Consumers are increasingly aware of “greenwashing”, and the number of complaints to the ASA is rising on a monthly basis. An upheld complaint on environmental issues could lead to a great deal of press attention, serious brand damage and potential scrutiny by campaign groups. Just as being viewed as an environmentally friendly company can be a significant benefit, a cynical or misjudged false claim could cause significant damage to the reputation of your brand and your organisation.

- *CAP, broadcast and non-broadcast codes*

The index page for the advertising codes can be found on the ASA website here:  
[www.asa.org.uk/asa/codes/](http://www.asa.org.uk/asa/codes/)

The relevant section of the non-broadcast code can be found here:  
[www.cap.org.uk/cap/codes/cap\\_code/ShowCode.htm?clause\\_id=1764](http://www.cap.org.uk/cap/codes/cap_code/ShowCode.htm?clause_id=1764)

- *(b) DTI and DETR Green Claims Code*

Last revised in June 2000, and published by DEFRA's previous incarnation the DETR, this document is informed by and sits alongside the CAP codes, but was produced following a wide-ranging consultation with business; it also draws heavily on ISO standards, especially ISO14021- "Environmental Labelling". It is designed to help companies make informed choices:

<http://www.defra.gov.uk/environment/consumerprod/gcc/pdf/gcc.pdf>

## The principles

1. **Make sure your claims can be verified:** As with all advertising claims those concerning the environment should be "legal, decent, honest and truthful". Not only is it important to observe the advertising codes regarding environmental claims, but a false claim, or "greenwash", could seriously damage your brand and your organisation.
2. **Avoid misleading phrases:** Phrases such as "environmentally friendly" or "green" should be avoided if possible as they are both difficult to substantiate and potentially misleading. Where possible environmental claims should refer to specific activity, so instead of referring to a product as "green" you could highlight a reduction in carbon emissions, or use of sustainable resources during production. Consumers increasingly understand terms such as "carbon offset", and often appreciate the difference between this and reduced emissions.
3. **Keep it simple:** Although claims must be verifiable and accurate it is possible to over-complicate your message by including too much data. Although you may be asked to provide detailed information to respond to a complaint about a claim, it is not necessary to include it all in your marketing material. As well as being more effective, a simple, plain-language statement is less likely to lead to errors or baffle the audience with unnecessary scientific detail. You may, however, wish to refer customers to an area on your website where they could find out about your claims in more detail.
4. **Exercise excellent supply chain management:** The CAP Broadcast code states that "Generalised claims for environmental benefit must be assessed on a 'cradle to grave' basis". Any claim for a product is assessed not just on the finished article, but also on the natural resources used, manufacture, packaging and disposal of the product. If you are making the claim you are responsible for driving environmental best practice both in your suppliers and consumers.

5. **Ensure claims are relevant:** Claiming that a product does not contain harmful chemicals, when it never has would be irrelevant and of course misleading; the same is true for qualified claims. Comparative statements such as “friendlier” or “greener” can be misleading and should only be used if it is possible to demonstrate that a product or service is significantly less harmful either than a competitor’s or as a result of recent improvements.
6. **Partner organisations:** There are many organisations, from environmental Non Governmental Organisations to independent consultants, which offer companies the opportunity to work in partnership. It is important to ensure that the partnership is right for your brand and that, as with any supplier, they are reputable and competent.
7. **Symbols:** Before using a specific symbol, such as the recycling “mobius loop”, ensure you have the right to use it. You should explain what the symbol means (if it is not part of a legally mandated or independent scheme), and that the product or communication lives up to its standards. This is becoming increasingly important as symbols and labelling become more popular, and the number of companies offering accreditation symbols increases.
8. **Science:** Many scientific claims are still open to debate and you should not present an opinion as being universally accepted. It is important to demonstrate why you are taking the action you are, but be aware that however eminent your scientific advice, it could still be open to serious challenges from pressure groups, the scientific community or even government.
9. **Be positive:** If your company has undertaken a massive change programme to then this must surely be a positive message. It is increasingly important to consumers that they are able to shop ethically and to employees that they feel their company is making a difference, but above all people want to feel that it is a positive contribution they have made.
10. **Keep evolving:** The debate is by no means static, and what might appear to be a legitimate claim today could be out of date in as little as 12 months. This is particularly important as a claim which today shows an exceptional environmental commitment could well represent a standard feature, or even legislative requirement, in the future.

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#### **Further reading**

*A climate of change: environmentally friendly advertising claims on the rise*, Advertising Standards Authority, [www.asa.org.uk/asa/focus/Live+Issue/Live+Issue+Environmental+claims+on+the+rise](http://www.asa.org.uk/asa/focus/Live+Issue/Live+Issue+Environmental+claims+on+the+rise)