

Green Claims Code Guide



Purpose of this document



- This document is based on the Competition & Markets Authority ([CMA](#)) [guidance on environmental claims on goods and services](#) (i.e. the Green Claims Code).
- The purpose of this document was to make the information in the Green Claims Code more accessible to publishers and commercial teams.
- As per the full Green Claims Code guidance, this document details CMA's 6 principles. In many occasions, the original text was copied directly into this document. However, when paragraphs were too long, the information was summarised or rephrased to make it shorter.
- Publishers and their commercial teams are encouraged to consult the original guidance in cases where further clarifications are required. The original guidance includes a number of useful case studies.

Content



- Introduction to the Green Claims Code
 - What are green claims
 - Background to the Green Claims Code
 - Green Claims Code Principles
- Green Claims Code Principles detailed
- Green Claims Code Checklist

Introduction to the Green Claims Code

What are green claims?

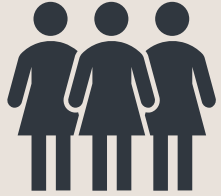


Green claims (sometimes called ‘environmental claims’ or ‘eco-friendly claims’) are claims which suggest that a product, service, process, brand or business is better for the environment. They include claims that suggest or create the impression that a product or a service:

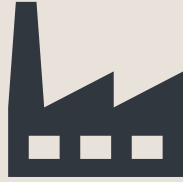
- has a positive environmental impact or no impact on the environment;
- is less damaging to the environment than a previous version of the same good or service; or
- is less damaging to the environment than competing goods or services.

Many businesses use green claims to help market their products or services. They do this through a range of methods such as: statements, symbols, emblems, logos, graphics, colours and product brand names.

Background to the Green Claims Code



Consumer demand for products and services which minimise harm to, or have a positive effect on, the environment



Businesses making green claims to meet that demand



Consumer protection law provides a framework for businesses to make environmental claims that help consumers make informed choices



CMA's Green Claims Code was developed to help businesses understand and comply with the consumer protection law when making environmental claims*



** While it is designed to help businesses, this guidance is not legal advice.*

Green Claims Code Principles



The Green Claims Code sets out principles which are designed to help businesses comply with the consumer protection law when making environmental claims.



claims must be truthful and accurate



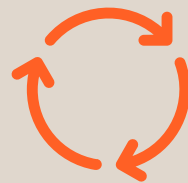
claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Green Claims Code Principles detailed

Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Claims must be truthful and accurate



Claims must not mislead consumers by giving them an inaccurate impression, even if those claims are factually correct. They must only give consumers the impression that a product, service, process, brand or business is as green and sustainable as it really is.

Ensure claims are correct - Claims must not state or imply things that are factually incorrect, nor should they overstate the positive environmental impact of a product service or brand.

Avoid general terms - Claims using general terms such as 'sustainable', 'green', 'eco-friendly' without explanation are likely to be inaccurate and to mislead.

Ensure specific terms are used appropriately - When using specific terms, the product should justify their use. For example if only parts of a product or packaging is recyclable or if other parts prevent recycling, it should not be claimed as recyclable.

Ensure your claim is not deceptive - A truthful claim can still be misleading if the product is responsible for other negative impacts or if the claim relates to a minor part of what the organisation does. How the product is presented (wording, logo, images) can also make a claim deceptive.





State the conditions for the claims to be true - Where claims are only true if certain conditions or caveats apply, those conditions or caveats should be clearly stated.

Make a claim only when your product is better than standard - Claims should not be made when a product only meet necessary standard or legal requirements. Claims are more likely to be acceptable where they relate to a recognised, objectively assessed accreditation that goes beyond mandatory legal requirements.

Before making a claim, ask yourself..







1/2

Is the claim true? 	Does the claim give an accurate picture of the sustainability of a product? 	How would consumers understand the terms use? 	Is the claim only true under certain conditions? 
<p>The first step is to ask yourself if the claim is factually correct. This might not be sufficient but it is however an essential starting point to ensure the claim isn't misleading.</p>	<p>General terms (e.g. 'green') tend to be unclear and risk misleading consumers by creating a much more favourable impression than is justified. When considering making these kinds of broad claims, businesses should review whether they have clear evidence that their products have a positive environmental impact.</p>	<p>Businesses should consider whether the term used in their claims would be understood correctly by consumers. For example, claiming that a pair of jeans is organic when it is made of only 35% organic cotton is misleading as consumers would likely understand from this claim that the pair of jeans is made of 100% (or a majority) of organic material. The company should label the percentage of organic material and list clearly the other materials.</p>	<p>Some claims may only be true if certain conditions are met. This type of claims can be made, as long as these conditions are clearly specified and prominent enough for consumers to see and understand them. For example, a disposable cup is compostable only in an industrial composter but is marked as 'compostable' and no other information is provided. In this case the claim is likely to be misleading as it does not specify the circumstances under which the product is compostable and the action the consumer needs to take.</p>

Before making a claim, ask yourself..



2/2

<p>Is what I say liable to deceive consumers? </p>	<p>Am I claiming benefits that are expected, or required by law? </p>	<p>Am I telling the whole story? </p>	<p>Do I give an overall impression that the benefits are greater that they really are? </p>
<p>The first necessary step is to ensure that claims are factually correct or true. Claims however can also mislead when the impression they give consumers about the benefit of a product is deceptive. The overall presentation of the claim, including its wording, logos and imagery is important.</p>	<p>Businesses should not claim an environmental virtue out of something which is a necessity or just an ordinary feature. The problem with these claims is that, while they may be true, they are likely to give the impression that what is being advertised is special, compared to other products or to what is normally available, when it isn't.</p>	<p>It is not necessarily a problem for businesses to make claims that focus only on one aspect of a product. However, if a claim fails to make clear what aspect of a product or business it relates to, it is liable to mislead. Even where that is clear, claims which ignore significant negative environmental impacts in order to focus on minor benefits or small parts of a business's activities are still at risk of misleading consumers.</p>	<p>Businesses should consider how a consumer is likely to interpret what they are told and what they are shown (incl. product names, branding, logos, labels, or indications of certification), and whether this matches the product's environmental credentials. Claims are less likely to be misleading where they contain information about the business's right to use the symbols and about how consumers can verify that and what it means.</p>

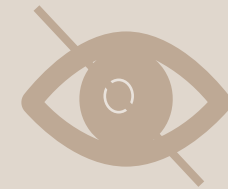
Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Claims must be clear and unambiguous



Claims should be worded in a way which is transparent and straightforward so consumers can easily understand them. They should not be presented in ways that are liable to confuse consumers or to give the impression that a product, service, brand or business is better for the environment than it is.

Ensure terms and the meanings they convey are clear - The meaning consumers are likely to take from a claim and the environmental credentials and impacts of the product, service, process, brand or business should match.

Avoid vague or general statement - At best, they can have a number of meanings that can confuse consumers and make it difficult for them to make informed decisions. At worst, they can give the impression a product, service, process, brand or business is better for the environment than is really the case. They can also be difficult to substantiate.

Differentiate product specific claims from claims related to wider environmental goals - claims about future goals should only be used for marketing purposes if the business has a clear and verifiable strategy to deliver them. Wider environmental goals of the business should also be clearly distinguished from product-specific claims.

Claims about a business's environmental ambitions must also be in proportion to its actual efforts. They are less likely to be misleading when they are based on specific, shorter term and measurable commitments the business is actively working towards. Where any benefits or impact would accrue over a longer period, that would need to be made clear, as there is more risk of consumers being misled if that benefit or impact is not immediate.

Before making a claim, ask yourself...



<p>Is the meaning of the terms used clear to consumer?</p>	<p>If vague or general terms have been used, have these been explained?</p>	<p>Does the claim relate to the whole product, or part of it?</p>	<p>Is the information you are providing to consumers useful or confusing?</p>
<p>Claims should be easy to understand.</p> <p>Scientific or technical language should be avoided unless it is easily understood by the average consumer.</p> <p>Key words should be defined, unless their meaning is clear and widely understood by consumers. Terms with multiple meanings should also be explained to ensure they are not misinterpreted.</p>	<p>General or all-encompassing sustainability claims such as 'environmentally friendly', 'eco', or 'sustainable' don't provide any real indication of what is meant. If anything, they are likely to create an overall impression that a product has a positive, or no, environmental impact.</p>	<p>Claims that relate only to a specific part of a product, service, process, brand or business should make that clear.</p> <p>For example, a product is labelled 'recyclable' without further explanation. The claim doesn't make clear if this relates to the whole product or not, or just its packaging. As the claim actually relates solely to the packaging and the remainder of the product is not recyclable, the claim is likely to mislead consumers into thinking that the whole product can be recycled. The claim is less likely to mislead if it is made clear that it is only the packaging that is recyclable.</p>	<p>Businesses should consider whether the information provided is:</p> <ul style="list-style-type: none">• relevant to the claim being made; and• presented in a clear way that the average consumer is likely to understand. If not, the claim could give a false impression about the environmental impact of the relevant product, service, brand or business. The information provided should always support the claims being made.

Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Claims must not omit or hide important relevant information



What claims don't say can also influence the decisions consumers make. Claims made by businesses must not omit or hide information that consumers need to make informed choices.

Think about the whole life cycle of the product – In many cases the impact on the environment will depend on the sourcing of the materials, the production processes, the distribution, use and disposal of the product. Businesses should make sure claims include the information consumers need to make an informed choice.

Avoid focusing on just one aspect of the product – Do not just focus on the positive environmental aspects of a product where other aspects have a negative impact, especially if the positive environmental impact is insignificant in comparison to the negative impact. Cherry-picking information like this is likely to make consumers think a product, service, process, brand or business as a whole is greener than it really is.

When promoting a brand or business, consider the impact of all its activities.

Add important qualifying information about a claim and ensure it is clear and easily identifiable (e.g. close to the claim).

Consider all information channels – Where there is limited space to include all the important information about a product for consumers to make informed decisions, this should be disclosed by some other means (e.g. by link to information on a website via a QR code).

Before making a claim, ask yourself...



1/2

What is the overall environmental impact of my product?



When thinking about making any sort of environmental claim for your product, service or process, for example, you should consider the overall impact of all its components. When the claim relates to a brand or business, it is important to consider the overall impact of all its activities.

For example, if a courier company claims that it is investing 10% more in electric vehicles, but does not disclose that it is also investing 40% more in diesel vehicles, then this would be a significant omission liable to mislead consumers.

What do consumers need to know to make informed choices about my product?



The information that should be disclosed to the consumer will vary from product to product. Businesses should think about the aspects of their products, services, processes, brands and activities that have an impact on the environment, from the sourcing right through to their disposal. A good rule of thumb would be to assume that consumers are likely to want to know about the overall environmental impact, including how easily a product, and its packaging, can be disposed of or recycled. Businesses should ask themselves whether the information would make consumers think twice about the decisions they make about a product, service, brand or business. If it would, that is a strong indicator that the information should be included in a claim.

Should I include information about the durability or disposability of my product?



The durability or disposability of a product can have a significant effect on its environmental impact. It can be an important consideration for consumers in deciding what they buy.

For example, businesses may be aware that products are due for imminent replacement and have a limited lifespan, or that they are likely to require ongoing maintenance or updating. Those factors can have an economic impact on consumers. Because they increase levels of consumption, they can also affect a product's impact on the environment.

These are important points businesses should consider when making claims.

Ignoring them risks making misleading omissions that harm consumers.

Before making a claim, ask yourself...



2/2

Do I need to caveat any claims that I am making?



If any claim you are making needs further explanation (for example, a product can only be recycled under certain circumstances), any caveats or conditions should be disclosed prominently and close to the main claim. The more conditions or caveats are hidden away in small print, where the average consumer is unlikely to see and understand them, the more likely consumers will be misled.

Where I do not plan to include information in a claim, why not?



Another way businesses could assess whether they are omitting important information is to think carefully about what they do not plan to include in a claim and why not. They could ask themselves:

- what are all the environmental impacts of their product or service, processes, brand and activities;
- whether there are good reasons for not including this information; and
- whether, if they do not get the information in a claim, consumers can still make informed choices about what's on offer. Businesses could also think about whether consumers would be surprised or disappointed to hear the omitted information after they had decided to buy a product.

Is there anything I need to tell consumers so that they make informed choices, but that I genuinely cannot fit into my claim?



If not all the necessary information can fit into the claim, consider whether it is appropriate – fair to consumers and good for the environment – to use the particular form of communication. If you do use it, you should consider what information it is possible to include and how else to make other information available to consumers in the easiest and clearest way you can.

Depending on the product in question, other information could be provided on a website accessed via a link that is clearly signposted, or via a QR code on a product label. The additional information provided should not contradict the main environmental claim which is being made.

Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Comparisons must be fair and meaningful



Comparative claims should compare like with like – Businesses can make claims comparing their own products (e.g. old and new versions) or comparing their products with competitor ones, as long as the claim is fair and correct. The products being compared should meet the same needs and fulfil the same purpose.

Quantitative claims should be calculated using the same method – A claim which compares two similar products' recyclable content, CO₂ emissions or organic composition, for instance, should calculate these measurements in the same way for each product.

The comparative claim should be verifiable – the comparative claim should indicate how the information that forms the basis of the comparison can be accessed in order for the comparison to be verified for accuracy. The comparison and the way it is presented should be clear enough for consumers to understand.

Before making a claim, ask yourself...



Is the claim comparing like with like?



The claim must make clear against what or whom the comparison is made. A product should only be compared to another that is similar and used for similar purposes. Businesses can test whether they are doing this by considering whether consumers would be likely to buy the comparator product, instead of theirs, and use it in the same way.

Is the like for like comparison a fair and representative one?



Some claims will compare products with a range of competitors in a market. Claims that appear to make market-wide comparisons, but are actually based on a limited sample, have the potential to mislead consumers.

For example, a business makes a general comparative claim that its toothbrush X contains 50% less plastic than other toothbrushes on the market*. The claim may be misleading if the products compared are not representative of the full range of toothbrushes on the market. The products against which the comparison is made and the proportion of the market covered should be clearly indicated in the claim.

(* the claim could be misleading if the 50% reduction in plastic results in a greater environmental impact, e.g. by being replaced by metal)

Is the basis of the comparison fair and clear?



If businesses consider the following when making comparative claims, they are less likely to mislead consumers:

- claims should make clear to consumers what is being compared and how the comparison has been made;
- claims should compare important and representative features or aspects of the relevant products;
- businesses should make sure products are compared using the same measures and that the same attributes of the product or service are being compared;
- claims should not omit or hide material information relevant to the comparison;
- comparative claims should be capable of being substantiated by transparent and accurate evidence that consumers can verify for themselves.

Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Claims must consider the full life cycle of the product or service



Businesses should consider what aspect of the life cycle would be of most interest to consumers - For example, when purchasing an electronic device or good, consumers will not only be interested in the performance of the product. They are increasingly likely to be concerned about how reparable, dismantlable and recyclable the product is.

Claims that focus on aspects of a product that are most significant in terms of the overall environmental impact are less likely to be misleading - However, claims that focus only on specific aspects that generate minor improvements are more likely to be problematic, especially if they lead to a greater environmental impact overall.

Claims should also make clear the limits of any life cycle assessment the business has done.- Where it has only been able to carry out a limited assessment, it may be possible for the business to make specific claims based on that assessment, but that should be clearly explained. They must not mislead consumers. Any life cycle analysis used to back up a claim should be up to date.

Before making a claim, ask yourself...



Does the claim reflect the whole product life cycle?



When assessing an environmental claim, the product's environmental impact over its whole life cycle may be relevant. Claims that reflect the whole cycle, or the most significant elements of the product's environmental impact, are less likely to be misleading.

Claims can mislead where they reflect only part of the life cycle. If they only relate to part of it, claims should make clear which. For example, if the claim specifically relates to manufacture, transportation, use or disposal of a product. There is a risk, though, that the overall effect could be misleading and businesses must ensure this is not the case.

By making a claim about one element of the product's life cycle, does the claim mislead the consumer about other aspects?



A claim can be misleading if it highlights only positive impacts. For example, a claim that a product is made using 'less water', but where other aspects of the production process have a significantly negative impact on the environment, may lead the consumer to believe it is better for the environment overall than it actually is.

Businesses should consider:

- which aspects of the product life cycle a claim relates to or reflects, and which aspects it does not;
- whether the focus of the claim is on the aspects of a product that have the most significant environmental impact;
- if any limitations of the claim are clear; and
- whether the consumer is given a misleading impression of the overall impact on the environment.

Do I have to disclose the full life cycle of a product in all instances where an environmental claim is made?



Whether the full life cycle of a product is information the average consumer needs to make an informed choice will depend upon the product in question.

It is likely that, in the coming years, consumers will demand more and clearer information about the provenance, processing and disposal of products and services as public awareness of environmental issues grows.

Claims that include information about the full life cycle of a product, or reflect that whole cycle, are less likely to mislead people and more likely to help them make informed choices that are better for the environment.

If a company wants to make a claim about a specific aspect of the product, it would need to avoid giving a misleading impression about the overall environmental impact of the product.

Green Claims Code Principles



claims must be truthful and accurate



claims must be clear and unambiguous



claims must not omit or hide important relevant information



comparisons must be fair and meaningful



claims must consider the full life cycle of the product or service



claims must be substantiated

Claims must be substantiated



Claims should be objective - Most environmental claims are likely to be objective or factual claims that can be tested against scientific or other evidence. Given the requirement that claims must be truthful and accurate, businesses should have evidence to support them.

However, when advertising claims are purely subjective, consumers may recognise them as such or treat them as advertising 'puff' that they do not take literally.

Businesses should be able to back up their claims - They should hold robust, credible, relevant and up to date evidence that supports them. Where they compare their products or activities to one or more competitor's, that evidence should cover all of them.

When investigating potentially misleading claims, the CMA or other enforcers can seek evidence from businesses to support their claim(s). If enforcement action ends up before the courts, the courts can require a business to provide evidence of the accuracy of claims. If a business does not provide it, or it is inadequate, the court may consider the claim inaccurate.

Environmental claims which are made with no regard to whether the business actually knows there is evidence to support them are also likely to be problematic, even if they turn out to be true. The nature of most environmental claims means consumers are likely to expect them to be based on supporting evidence. Where they are not, businesses are likely to have fallen below the standards of diligence and care consumers are entitled to expect of them.

Before making a claim, ask yourself..



1/2

<p>Is the claim you are making subjective or objective? </p>	<p>Do you have appropriate evidence to support your claim? </p>	<p>Is the evidence based on accepted science or understanding? </p>	<p>Has the evidence been subject to independent scrutiny? </p>
<p>Most environmental claims are likely to be about things that can be measured against the evidence. They are likely to be objective or factual claims, or based on underlying facts, that are capable of substantiation. That is likely to apply even to claims that products, for example, are the 'cleanest,' 'safest' or 'best' for the environment. Those are matters which can be tested against a range of measures for which evidence can be gathered.</p>	<p>What is required will depend on the nature of the product and the claim being made. In general, the evidence should be robust, credible and up to date. It may come from published research or studies a business has commissioned. The more independent and widely supported the evidence, the more likely it will be to support a claim. Broader and more ambitious claims (e.g. a product is 'environmentally friendly') may be more difficult to substantiate as it would require strong evidence about its impacts on the air, soil and water, its packaging, its components and production processes, its use and/or its disposal, etc.</p>	<p>Where a claim is not based on accepted scientific or other evidence it is likely to be more difficult to substantiate. Claims based on material that departs significantly from accepted scientific understanding or methodology, or for which there is conflicting evidence, are more likely to be misleading.</p>	<p>Being able to demonstrate that the evidence for a claim has been subjected to independent scrutiny, particularly where it is complex or controversial, may help ensure that it is robust.</p>

Before making a claim, ask yourself...



2/2

<p>Is the evidence up to date? </p>	<p>Does the evidence reflect 'real world' conditions? </p>	<p>Is evidence available to or from others in your supply chain? </p>	<p>Is the evidence publicly available and can consumers verify the claims? </p>
<p>It is also important to keep claims under review and it may be necessary to revisit them, and the evidence that supports them, over time. Keeping evidence up to date is likely to be particularly important where claims are maintained for longer periods or in areas where scientific understanding or consumers' expectations are developing quickly.</p>	<p>If you are using, for example, the results of laboratory tests to support a claim about the way in which a product might break down over time, does this reflect conditions that will generally or normally be experienced by consumers in the 'real world'? If a claim is based on evidence where the conditions are unlikely to be replicated in normal day-to-day use, or only replicated in very specific circumstances, then it could be misleading.</p>	<p>Businesses, including manufacturers and those further up the supply chain, that engage in commercial practices directly connected with promoting the sale or supply of products to consumers are responsible for the impact of those practices. Where one business manufactures or supplies products to another, whether for resale or incorporation into other products, both businesses may be liable for claims and may have to substantiate them. Businesses should make sure they can do so. That may mean ensuring they obtain evidence from others in the supply chain.</p>	<p>Claims are less likely to mislead where the supporting evidence is publicly available and it is clear where and how consumers can verify the claims. This will help those who are interested in understanding a claim in more detail. Where a claim makes specific reference to the evidence that supports it, for example, to a study or survey, this should be publicly available in a way that is easily accessible to consumers.</p>

Green Claims Code Checklist

Green Claims Code Checklist



When making a green claim, your business should be able to answer ‘yes’ or agree to each of the following statements:

- The claim is accurate and clear for all to understand.
- There’s up-to-date, credible evidence to show that the green claim is true.
- The claim clearly tells the whole story of a product or service; or relates to one part of the product or service without misleading people about the other parts or the overall impact on the environment.
- The claim doesn’t contain partially correct or incorrect aspects or conditions that apply.
- Where general claims - for example “eco-friendly”, “green” or “sustainable” are being made, the claim reflects the whole life cycle of the brand, product, business or service and is justified by the evidence.
- If conditions or caveats apply to the claim, they’re clearly set out and can be understood by all.
- The claim won’t mislead customers or other suppliers.
- The claim doesn’t exaggerate its positive environmental impact, or contain anything untrue – whether clearly stated or implied.
- Durability or disposability information is clearly explained and labelled.
- The claim doesn’t miss out or hide information about the environmental impact that people need to make informed choices.
- Information that really can’t fit into the claim can be easily accessed by customers in another way, for example a QR code, website etc.
- Features or benefits that are necessary standard features or legal requirements of that product or service type, aren’t claimed as environmental benefits.
- If a comparison is being used, the basis of it is fair and accurate, and is clear for all to understand.