



Global Guidance on Environmental Claims

September 2022



Inspired by: WFA

In partnership with:

ACC | AEA | BAM | BABM | BCBP | Bpost | Brightfish | C² | Event Confederation
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About this guidance

These Zero Greenwashing Guidelines have been developed by the World Federation of Advertisers (WFA) in accordance with the Paris Agreement and the European Green Deal, to encourage best practices at all stages of the marketing value chain.

The guidelines are adapted to Belgium as a member of the CommToZero platform, an alliance of the biggest players in the marcom sector.

The goal is to promote more sustainable consumer behaviour, by harnessing the power of marketing as a catalyst for positive change both internally and with the consumer. Secondly, we want to **create a trusted marketing environment**, where sustainability claims can be easily substantiated so that consumers can trust the marketing messages that reach them. And finally, we want to reduce the carbon emissions of our industry.

The Zero Greenwashing guidelines are built around 6 principles based on international standards for green claims. With these guidelines, the coalition wants to train, inform, adapt and modernise the marcom sector in order to prevent misleading environmental claims in communication.

What is the CommToZero initiative all about?

In the current climate crisis, we must all take responsibility, individually and as a sector. Today, we see that communication plays a fundamental role in ecological transition. CommToZero is an initiative that arose from the idea that when we act together, the value chain of the communication sector is better equipped to face the climate crisis.

Based on this initiative, Belgian agencies, advertisers and media are striving for a more sustainable communication.

How?

By **developing** the talent of organisations to set up climate actions, by providing tools and advice to stakeholders.

By **cultivating** the power of communication to encourage consumers to think about the environment as much as possible.

By **supporting** a trusted communication environment where environmental claims can be easily substantiated so that consumers can make informed decisions.

By **creating** a platform of and for the Belgian communication sector, based on the two responsibilities it has as a sector to ensure the needs of future generations are not compromised: zero carbon and zero greenwashing.

On **the CommToZero platform**, there is a calculator that all sector members can use at their discretion to calculate the carbon footprint of a communication campaign for the production and media sections.

The **aim** is to raise awareness and take action to reduce the carbon emissions of marketing campaigns.

We also want to increase consumer confidence in commercial communication and fight greenwashing in environmental claims. Therefore, we prepared this guide to inform and educate the industry on the use and wording of environmental claims



Purpose of the guidance

The increased urgency for **businesses to play their part in tackling climate change and other environmental harm** is reflected in national and international legislation, and agreements on climate change, such as the increased urgency for businesses to play their part in tackling climate change and other environmental harm is reflected in national and international legislation, and agreements on climate change, such as the European Green deal signed by Belgium. Belgium also committed



to take initiatives to reduce CO2 emissions and become carbon neutral by 2050. Belgium also decided to move towards renewable energy, more energy-efficient buildings, etc. Read more about the [National Energy-Climate Plan](#).

Experts across the world have emphasised that for net zero and other climate-related targets to be met, the behaviour of both businesses and consumers must change. Given **the role that marketing communications can play in influencing consumer behaviour**, this policy-making context is important to marketers making claims about the environmental credentials of their businesses and products. If marketers cannot back up the claims they make, they face real risk of enforcement action by regulators and reputational damage to their brands and businesses. Conversely, if **marketers make accurate environmental claims, supported by robust evidence, this contributes to credibility and consumer trust**, and, ultimately, to helping consumers make choices that are less damaging to the environment.

With this context in mind, **this guidance is built around six principles designed to help marketers, agencies and others involved in the production of marketing** (referred to as “marketers” in this guidance) avoid the common pitfalls that can lead to misleading environmental claims (also known as “misleading green claims” or “greenwashing”). Key legislation, self-regulatory codes and other relevant industry codes (for example, Chapter D of the International Chamber of Commerce’s Advertising and Marketing Communications Code, which deals with environmental claims) have been reviewed and taken into consideration in producing this guidance. Although the guidance is not legally binding, if the six principles are followed, it is likely that environmental claims will not be misleading.

The six principles are illustrated with examples on how the relevant regulatory authorities around the world examine different types of environmental claims in the light of rules to prevent misleading advertising. **Marketers must always ensure that they comply with all laws and rules set by regulators.** Marketers should also consult an

expert to ensure compliance with laws and other rules, if necessary.

In Belgium, the JEP provides advice to help comply with Belgian regulations. The form for requesting advice is available on the [JEP website](#). More information on JEP later in this brochure



Environmental claims and greenwashing

What are environmental claims?

“Environmental claims” are any claims about the environmental attributes or impact of a product or business, including claims that a product or business has no negative impact, a positive impact, or a comparatively better impact on the environment. They can be based on the composition of products, the way they have been manufactured or produced, the way they can be disposed of and the reduction in energy or pollution which can be expected from using them.

Environmental claims can be made in many ways, both express and implied, and include all types of claims, information, symbols, images, logos, graphics, colours, and company, product or brand names.

What are misleading environmental claims, and why are they a problem?

Misleading environmental claims are claims related to a business’s or product’s environmental attributes or impact on the environment that are not properly substantiated or that contain false information, omit important information, are exaggerated or are presented in an unclear, ambiguous or inaccurate manner.

Given the global significance of climate change and environmental issues, consumers’ decisions to buy products are increasingly influenced by a desire to reduce environmental harm or to have a positive impact on the environment. Environmental claims have become more prevalent with this increased importance, and it is therefore vital that the audience of marketing communications is given information on which they can rely, to make informed decisions. It is also difficult for the audience to self-assess the accuracy of environmental claims, and it therefore relies on the information provided to by marketers. It is therefore essential that marketers hold robust evidence to support their claims before they make them, and this is explained in more detail in Principle 2 (see Section 2).

Some common examples of environmental claims are:



**Sustainable or
Good for the
planet**



**Environmentally
friendly**



**Recyclable or a
Mobius Strip symbol**
(used to demonstrate that
a product is recyclable)



**Zero emissions
or Lower
emissions**



**Use of images in
certain contexts**
(for example trees,
rainforests, water, or
animals))



**Green or
Greener**



**Carbon neutral,
Climate neutral
or Net zero**



**Use of the
colour green or
blue in certain
contexts**



**Plastic free
or other
“free of” claims**

The 6 principles to avoid greenwashing in commercial claims



1. Honesty

Claims must not be likely to mislead, and the basis for them must be clear.



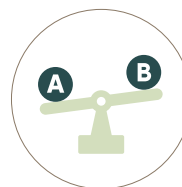
4. Full lifecycle

Marketers must base general environmental claims on the full lifecycle of their product or business.



2. Evidence

Marketers must hold robust evidence for all claims likely to be regarded as objective and capable of substantiation.



5. Comparisons

Products compared in marketing communications must meet the same needs or be intended for the same purpose.



3. Information

Marketing communications should must not omit material information. In some cases, it is possible to use alternative means to make the information readily accessible.



6. Compliance

Marketers must include all information relating to the environmental impact of advertised products that is required by law or self-regulation codes applied by the JEP.

This checklist is based on Chapter D of the ICC Code (https://www.jep.be/sites/default/files/rule_recommendation/2018_icc_publicite_et_marketing_code_de_communications.pdf) and on the « ICC Framework for responsible environmental marketing communications ».

Principle 1: Honesty



Claims must not be likely to mislead, and the basis for them must be clear.

Marketing communications must not include misleading claims, imply anything inaccurate, or exaggerate, and marketers must hold substantiation for claims as they are likely to be understood by the audience. Marketers should take account of the following.

Presentation: the overall presentation of marketing communications, including words, symbols, and imagery, as well as missing information, can all contribute to the audience being misled.

Signs & symbols: Marketers should not use environmental signs and symbols in a way that falsely suggests official approval or third-party certification.

Substantiation: Environmental claims are likely to mislead if the basis of claims is unclear. Further information may be necessary for the audience to understand the basis of claims, and unqualified claims could mislead if they omit this. See Principle 3.

Broad versus narrow claims: Broad, general or absolute claims have greater potential to mislead. Claims like “environmentally friendly”, “sustainable” or “green” suggest that a product or business has an overall positive environmental impact, or no negative impact. Unless marketers hold robust evidence, they should avoid such claims.

Interpretation: Marketers should consider the audience’s likely interpretation. Where a claim could be interpreted as absolute, or in different ways, additional information is required. For example, a “carbon neutral” claim based on offsetting is likely to need information that this is the case.

Although understanding of environmental claims is increasing as they become more common, marketers should not assume knowledge greater than is reasonable or likely, particularly if marketing communications are untargeted.

No impact claims: Marketing communications must not mislead by highlighting the absence of an environmentally damaging ingredient if it is not usually found in the product category or if the product contains another ingredient posing similar harm, or by suggesting that an environmental benefit resulting from a legal obligation is a distinctive feature of a product.

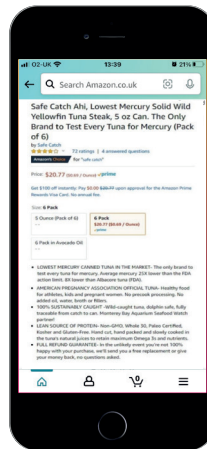
Case study

Safe Catch Tuna - USA, Internet (Amazon)

Does this Amazon ad for '100% Sustainably Caught Tuna' from the US break the rules on green claims?

It claims...

- **Lowest mercury canned tuna in the market** - The only brand to test every tuna for mercury. Average mercury 25x lower than the FDA action limit. 8x lower than the Albacore tuna (FDA)
- **American pregnancy association official tuna** - Healthy food for athletes, kids and pregnant woman. No precook processing. No added oil, water, broth or fillers
- **100% Sustainably caught** - Wild-caught tuna, dolphin safe, fully traceable from catch to can. Monterey Bay Aquarium Seafood Watch partner!
- **Lean source of protein** - Non-GMO, Whole 30, Paleo Certified, Kosher and Gluten-Free. Hand cut, hand packed and slowly cooked in the tuna's natural juices to retain maximum Omega 3s and nutrients.
- **Full refund guarantee** - In the unlikely event you're not 100% happy with your purchase, we'll send you a free replacement or give your money back, no questions asked.



To find out if this decision was upheld, [click here](#).

Case study

MSC Cruises - Belgium (OOH)

A Belgian ad for MSC Cruises attracted a complaint from a consumer who took issue with the company's claim to be 100% carbonneutral. She argued that it was unacceptable greenwashing but did the regulator agree?

To find out if this decision was upheld, [click here](#).



Principle 2 : Evidence



Marketers must hold robust evidence for all claims likely to be regarded as objective and capable of substantiation.

Most environmental claims are likely to be regarded as objective and capable of objective substantiation. Marketers must therefore ensure that they hold robust substantiation for all such claims, direct or implied, and should bear in mind the following:

Substantiation: Substantiation must specifically relate to the type of claim made. Absolute or general claims, especially when made without clarification, will require a different type of evidence. For example, in addition to their meaning being clear to the audience (see Principle 1), claims like “environmentally friendly” or “green” will need a different type of evidence than that needed for claims like “better for the environment” or “greener”.

Evidence: Marketers must hold evidence before making claims and should retain it for a reasonable time after making claims, so they can provide it on request from regulators or others.

Evidence should be up-to-date (or not superseded by later evidence), and follow current standards of accepted scientific methodology. Claims should be reassessed and updated following any developments in evidence or technology, or new products being made available or taken off the market, which affect their accuracy.

Marketing communication containing specific environmental commitments, even if aspirational and likely not to be met until many years in the future (such as “net zero”, “carbon negative”, “climate positive” claims) require the advertiser to demonstrate that it reasonably has the capacity and methodological approach to achieve such commitments in the specified timeframe.

Claims based on conflicting evidence are more likely to mislead. Where a division of informed or scientific opinion exists, this should be made clear to the audience, and in cases where evidence is inconclusive, or there is significant disagreement on environmental impacts, the substantiation is more likely to be considered insufficient without further clarification.

Independence feeds robustness: Independently assessed evidence is likely to be more robust.

Case study

EasyJet - France (Press Ad)

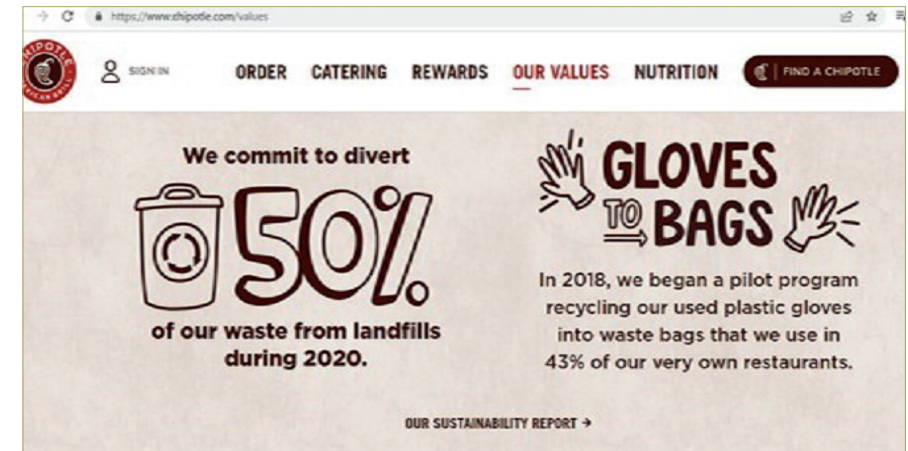


EasyJet's claim in a French press ad that it doesn't "teach lessons, we offset our emissions" and "From 2019 we are offsetting our carbon emissions from the fuel used on all our flights by supporting environmental projects" attracted a complaint.

To find out if this decision was upheld, [click here](#).

Case study

Chipotle - USA (Broadcast, online)



Fast food brand Chipotle makes claims about the environmental impact of its ingredients, how much food waste is diverted from landfill and how staff waste such as gloves are managed. Are such claims justified? The US's NAD had to adjudicate.

To find out if this decision was upheld, [click here](#).

Principle 3 : Information



Marketing communications must not omit material information. Where time or space is limited, marketers must use alternative means to make qualifying information readily accessible to the audience and indicate where it can be accessed.

Marketing communications can mislead because of what is not said, or not said clearly. Marketers should take into account the following:

Clarification: Where specific factors contribute to understanding of claims, or claims are only accurate in certain circumstances, information about these should be included in the ad. The following are examples of the types of claims which can mislead:

- claims that do not make clear if an advertised environmental benefit only results from specific action or behavioural change;
- claims that refer to compliance with a standard, which do not give the audience enough information to understand the standard;
- claims that a product can be recycled, which do not make clear any limitations to this; or
- environmental signs or symbols that do not clearly indicate their source and meaning.

Qualifications: Claims which are contradicted by qualifications can easily mislead, and qualifications should therefore clarify, not contradict.

Qualifications must be prominent and close enough to claims to be easily seen. If marketing communications are significantly limited by time or space (for example, online banner ads), marketers should make qualifying information easily available by other means (for example, via a single click on a link). Claims should make clear how the audience can access the information, and it should not contradict the claim. If time or space limitations mean that claims are misleading without the qualifying information, marketers should either consider using a different claim or a different medium that is not time or space-limited.

Product-related claims: If a claim relates only to a specific part of a product or business, the marketing communication should clarify this. For example, if a “recyclable” claim relates only to the packaging of a product.

Case study

First Gas Group

- New Zealand (Television and YouTube)



An Audiovisual ad in New Zealand featured a controversial voiceover for Firstgas Group. The claim that the company is 'ensuring our gas is going zero carbon' attracted complaints arguing that this was not yet possible. Were they right?

To find out if this decision was upheld, [click here](#).

Case study

CalciTrio Naturel food supplement

- Hungary (TV & Print)



Even the brand name of CalciTrio Naturell food supplement came under scrutiny when Hungary's regulator looked at its TV and print messages claiming that the product is made from '100% plant-based calcium'.

To find out if this decision was upheld, [click here](#).

Principle 4 : Full lifecycle



Marketers must base general environmental claims on the full lifecycle of their product or business, unless the marketing communication states otherwise, and must make clear the limits of the lifecycle.

General claims must always relate to the full lifecycle of the product or business, including, for example: component parts; production; use; disposal; and waste or by-products. Marketers should take into account the following:

Qualification level: Claims should not be unqualified unless marketers hold evidence that the claim applies to the entire lifecycle of the product. For example, absolute claims like “environmentally friendly” must only be made if the advertiser can demonstrate that the product’s entire lifecycle has no detrimental effect on the environment.

Specificity: If marketers cannot justify general claims, they must clarify that claims relate only to part of a product’s lifecycle. However, marketers must not mislead the audience by unduly emphasising the positive impact of insignificant aspects, particularly where the overall impact of the product’s lifecycle is negative.

The following examples illustrate this:

- A “zero emissions” claim about an electric vehicle may be acceptable if the marketing communication clarifies that this relates to emissions when driving only.
- Where farming methods used to produce a product provide an environmental benefit over other farming methods, the marketing communication must clarify that this relates to the farming method only, as opposed to the whole product.
- If an advertiser has reduced plastic packaging for part of a product, the ad must not imply an overall reduction in plastic for the product.

Business-related claims: Marketers must not mislead the audience about the environmental impact of their business. Claims must either relate to the whole business or clarify that they relate only to specific parts. Claims that focus on minor benefits of a business when the rest of the business is harmful are more likely to mislead.

Case study

Lavazza - France (Billboard poster)



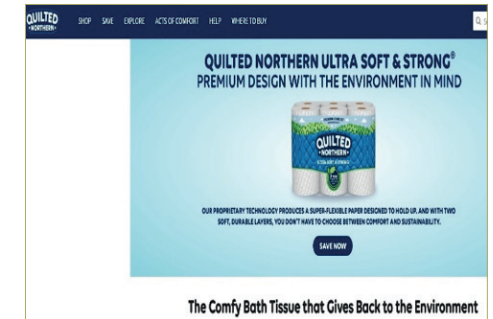
A visual in an ad for coffee brand Lavazza attracted a complaint to the Jury for Advertising Ethics as it appeared to suggest that drinking the brand would aid planet protection.

To find out if this decision was upheld, [click here](#).

Case study

Quilted Northern Ultra Soft & Strong Bathroom Tissue - USA (Product packaging, online)

Bathroom tissue brand Quilted Northern makes claims on its website and on packaging about its practice of planting trees to replace those used to make its products. Were these claims credible?



To find out if this decision was upheld, [click here](#).

Case study

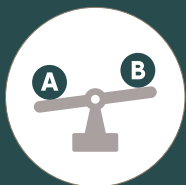
Inga - France (Facebook post and video)



Inga's social media ads for its reusable paper towel products included a claim that it is a "zero waste" solution and "really good for the planet". Did the regulator believe it?

To find out if this decision was upheld, [click here](#).

Principle 5 : Comparisons



Products compared in marketing communications must meet the same needs or be intended for the same purpose. The basis for comparisons must be clear, and allow the audience to make an informed decision about the products compared.

Marketers often use comparisons, which include comparing their own products against their competitors' products or comparing new versions of their own products with previous versions. Comparative claims should compare like with like, and the basis of the comparison should always be clear to the audience. Marketers should take the following into account when making comparisons:

Nature of comparison: Claims should make clear to the audience what is being compared and how the comparison has been made. For example, a claim of "50% less plastic" should include information about which parts of a product this applies to, and whether the comparison is against the advertiser's previous product, a competitor's product or other similar products on the market.

Claims should compare important and representative features or aspects of the relevant product. Comparisons against insignificant aspects of products have the potential to mislead, particularly if other aspects have a significant environmental impact.

Claims should not omit or hide material information relevant to the comparison and environmental benefits being compared should not be exaggerated.

Substantiation: Claims should be capable of being substantiated by evidence. In some jurisdictions (for example, the UK and the European Union), claims about identifiable competitors or their products must be capable of being verified by consumers, and marketers should set out the relevant verification information in the ad, or signpost how the information used to make that comparison can be checked.

Methodology: Claims should be based on the same methodology and comparing the same aspects.

Superlative claims will require a more comprehensive evidence base than comparative claims (for example, "the greenest airline" or "the lowest CO2 emissions of all major airlines" versus "lower emissions than X airline").

Case study

Beech-Nut Nutrition - USA (television, internet)



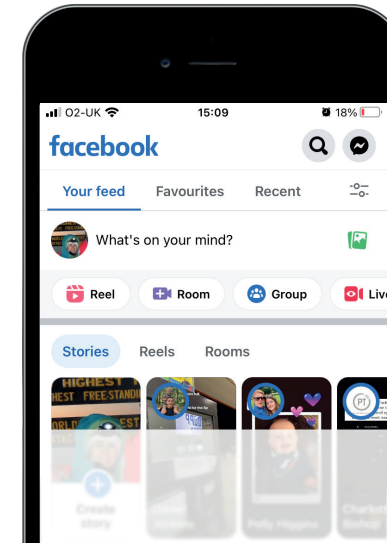
Beech-Nut Nutrition promoted its products via TV and online ads in the US, claiming that "Glass is nature's safest container" and that "Glass is the ultimate in sustainability".

Find out if they were right to do so [here](#).

Case study

Rock Gas Wellington

- New Zealand (Sponsored Facebook post)



Rock Gas Wellington's Facebook post states that "LPG is a fantastic fuel for heating and cooking and offers lower carbon emissions than other energy options." The ASA had to assess whether this was true, what did they decide?

To find out if this decision was upheld, [click here](#).

Principle 6 : Compliance



Marketers must include all information relating to the environmental impact of advertised products that is required by law, regulators or Codes to which they are signatories.

The JEP deals with consumer complaints about the content of commercial communications. In case of complaints, you will be contacted by the JEP to make your point of view known.

However, the JEP also has a preventive function. If you have any doubts about the ethical and/or legal aspects of your commercial communication, you can call on the JEP before the publication of your communication. This procedure is confidential and will not be published on the JEP website. In this case, you can use [this form](#) to request advice.

Take the test and assess whether your claim is “greenwashing”

The following exercise will give you an indication of whether your claim is justified.

Answer the following questions with “yes” or “no” before making a claim.

- | | | | |
|---|---|--|---|
| 1. Do I tell the whole story (i.e. my claim is not just about one part of my product or activity)? | <input type="radio"/> yes
<input type="radio"/> no | 5. Does the claim compare comparable items? | <input type="radio"/> yes
<input type="radio"/> no |
| 2. Does my claim present the environmental benefits (or limited harms) of the product/activity as they actually are (without exaggeration)? | <input type="radio"/> yes
<input type="radio"/> no | 6. Does the evidence reflect ‘real world’ conditions? | <input type="radio"/> yes
<input type="radio"/> no |
| 3. Does the claim relate to the whole product (not just a part of it) and reflect the whole life cycle of the product? | <input type="radio"/> yes
<input type="radio"/> no | 7. Is my claim true and accurate in all cases and are the exceptions (if any) perfectly clear? | <input type="radio"/> yes
<input type="radio"/> no |
| 4. Has the evidence been independently reviewed and is it up to date? | <input type="radio"/> yes
<input type="radio"/> no | 8. Can the terms I use be generally understood by all consumers and does my product/ service / brand / activity deserve these terms? | <input type="radio"/> yes
<input type="radio"/> no |

If you answered “no” to at least one question, you may want to re-evaluate your claim to avoid greenwashing.

For more information, see the [CMA’s guide](#) to environmental claims for goods and services.

JEP

Created in 1974 by the Communication Center vzw, the “Jury d’Ethique Publicitaire » / “Jury voor Ethische Praktijken inzake reclame”, better known as JEP, is the self-disciplinary body of the Belgian advertising sector whose mission is to ensure the correctness and fairness of advertising messages towards the public.

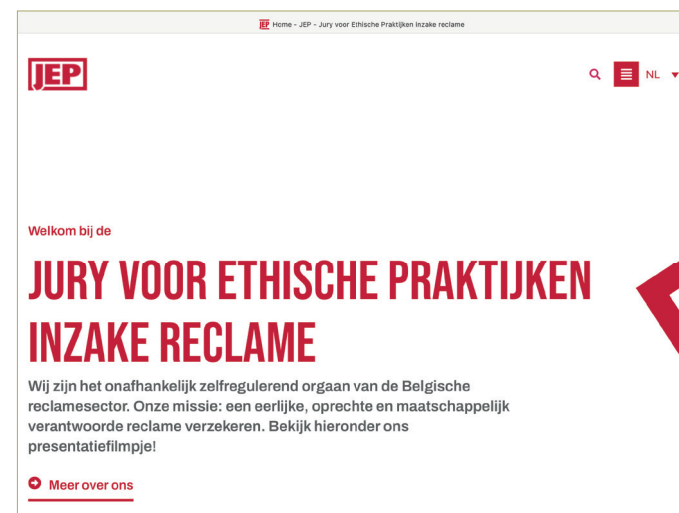
The Communication Center is the professional organization that brings together all the communication professions, i.e. advertisers, the media, communication agencies and the digital sector.

It aims to achieve excellence in the operation of the JEP and continues its investment in the strengthening and evolution of self-regulation. It therefore defends honest, truthful, and socially responsible advertising.

The JEP is composed in a parity and representative way, i.e. half of its members are from civil society and the other half from the communication sector. This guarantees the independence of its decisions. Acting on the basis of complaints, the JEP is competent for the examination of advertising content broadcast in the audiovisual and digital media, print media, posters, folders and points of sale.

It bases its decisions on legislation and self-regulatory codes.

The JEP also has a preventive mission. Advertisers, agencies and even the media can ask the JEP for advice before broadcasting their campaigns.



Aknowledgments and sources

- Credits: The Global Guidance on Environmental Claims is an initiative of the WFA and was adapted for the Belgian market by the CommRoZero industry platform
- Niveau EU: Unfair Commercial Practices Directive
- CMA guidance on environmental claims on goods and services
- ICC - International Chamber of Commerce
- Règles existantes spécifiques à certains secteurs:
 - Article 4.2.1 du Code DETIC
 - Point 2 du Code Febiac
- JEP - www.jep.be