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Environmental claims

Background

Marketers should take account of Government guidance including the Green Claims Code published by DEFRA and BIS.

Rules

- 11.1** The basis of environmental claims must be clear. Unqualified claims could mislead if they omit significant information.
- 11.2** The meaning of all terms used in marketing communications must be clear to consumers.
- 11.3** Absolute claims must be supported by a high level of substantiation. Comparative claims such as “greener” or “friendlier” can be justified, for example, if the advertised product provides a total environmental benefit over that of the marketer’s previous product or competitor products and the basis of the comparison is clear.
- 11.4** Marketers must base environmental claims on the full life cycle of the advertised product, unless the marketing communication states otherwise, and must make clear the limits of the life cycle. If a general claim cannot be justified, a more limited claim about specific aspects of a product might be justifiable. Marketers must ensure claims that are based on only part of the advertised product’s life cycle do not mislead consumers about the product’s total environmental impact.
- 11.5** Marketers must not suggest that their claims are universally accepted if a significant division of informed or scientific opinion exists.
- 11.6** If a product has never had a demonstrably adverse effect on the environment, marketing communications must not imply that the formulation has changed to improve the product in the way claimed. Marketers may, however, claim that a product has always been designed in a way that omits an ingredient or process known to harm the environment.
- 11.7** Marketing communications must not mislead consumers about the environmental benefit that a product offers; for example, by highlighting the absence of an environmentally damaging ingredient if that ingredient is not usually found in competing products or by highlighting an environmental benefit that results from a legal obligation if competing products are subject to that legal obligation.
- 11.8** Marketing communications for specific energy-related products, subject to a delegated regulation, that include energy-related information or disclose price information, must include an indication of the product’s energy efficiency class i.e. in the range A+++ to G.