

# Assessment of Green Claims on Products

Five Winds International

A research report completed for the Department for Environment, Food  
and Rural Affairs

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## **Assessment of Green Claims on Products, EV0431**

**Report to the Department for Environment, Food and Rural Affairs**

**Summary for Policy Report June 2010**

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**Appendix 1 – Full Technical Report**

## Glossary

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CO <sub>2</sub>	Carbon Dioxide
Defra	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EPA	US Environmental Protection Agency
FSC	Forest Stewardship Council
SAOS	Soil Association Certification Ltd.
Self-made logo	Logos created by the product manufacturer, not used by other manufacturers or organisations
Third-party logo	Logos that are not self-made by the product manufacturer. These include logos that are either mandatory or voluntary, rule based or non-rule based, verified or not verified
Verified logo	Logos where compliance with the standard or criteria is verified by an independent third party, ecolabel organization, or other party
VOCs	Volatile Organic Compounds

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# 1 Project Context and Scope

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## 1.1 Context

In the past five years, the marketplace has seen a proliferation of “green” claims promoting environmental features or benefits of many consumer products. In addition to the rise in the overall number of claims, several new concepts have emerged. For example, credit cards may carry a claim about carbon offsets, or orange juice may carry a claim about its carbon footprint. This rise in green claims parallels a spike in consumer demand for green products (goods and services) as well as consumers’ understanding of green purchasing.<sup>1</sup> Indeed, the term “green washing” has become commonplace in the popular media and if green claims are ambiguous or misleading there is a danger that consumers may become cynical and resist buying products on environmental or ethical grounds.

Defra’s green claims practical guidance outlines best practice principles for conveying the environmental credentials of a product or service in promotional literature and advocates the use of clear and credible environmental claims on products. For businesses, the guidance provides a basis for consistency; by using credible claims, companies can strengthen their overall reputation and credibility with customers and business partners. In parallel, the guidance also provides consumers with a resource for information about the meaning and relevance of claims, and as such allows them to make more informed decisions.

Defra last updated its Green Claims Code in 2003 and published Defra’s green claims practical guidance. Since then claims in the market have evolved and consumer understanding of these issues has increased. In March 2010 Defra launched a consultation on new green claims guidance. The evidence base for the revised guidance includes the current level, type and impact of green claims in a four-part investigation. This project is one part of the overall study, which aims to investigate the ‘state of play’ of green claims on products in the UK, and draws together data on the use of green claims on product packaging and associated materials. The information obtained from the project will also inform Defra’s future policy around green claims.

## 1.2 Project Scope

The purpose of this project was to obtain an overall picture of the extent of green claims found on product packaging and associated materials, such as websites or leaflets. The approach used was to visit stores, look at products on the shelves, and create a “snapshot” of the environmental claims a consumer would see during a normal shopping trip. The project had two main objectives:

1. To get an overall picture of the extent of green claims found on product packaging and associated materials, and
2. To identify in which sectors and on which products such claims appear, and to better understand the context of those claims.

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<sup>1</sup> Landor 2009 Image Power Green Brands Survey, <http://www.landor.com/index.cfm?do=thinking.article&storyid=749&source=home>

Some claims were reviewed in more detail to identify the company’s basis for making the claim; however in this project **no attempt was made to assess the validity of the individual environmental claims or whether the claim could be viewed as greenwash.**

The types of claims considered in this study included logos and environmental images, as well as words and phrases. It also included mandatory claims where relevant, for example, the EU A-G energy logo on energy using products. Words and phrases that were advisory were included in the analysis. By ‘advisory’ or ‘instructional’ we mean claims such as ‘please recycle’, ‘recyclable’, or instructions or symbols relating to disposal (such as the Mobius loop). However, it could be argued that such claims are not really environmental claims because they do not specifically relate to a product’s environmental attributes. Therefore, some analyses show the results both with and without these advisory claims. The claims identified were categorised according to subject. These categories are listed below in Table 1

<b>Claim Category</b>	<b>Description</b>
<b>Air</b>	General air quality or volatile organic compounds (VOCs)
<b>Biodegradable</b>	Degradable, biodegradable, compostable
<b>Carbon / Climate</b>	Climate-related claims, greenhouse gases, carbon, CO <sub>2</sub> , carbon footprinting
<b>Cause</b>	Environmental cause-related, donate or support an environmental organization
<b>Efficiency</b>	Energy efficiency or fuel efficiency
<b>Forest</b>	Forest-related, timber
<b>General</b>	General environmental claims, including natural, ecological, minimal impact, safe for the environment, steps toward green, cleaner means greener, our home, our planet, go green, eco-friendly, etc.
<b>Water</b>	Reduced water consumption, water reuse, wastewater treatment, anything water related
<b>Instructions</b>	Environmentally-related instructions such as please recycle, How To, For More Info, or guidance on product disposal (i.e. "Please dispose of this carefully")
<b>Life Cycle</b>	Life cycle, cradle-to-grave, cradle-to-cradle, or description of impacts across a products’ whole cycle (manufacturing, use, etc.)
<b>Materials</b>	Material or resource efficiency, renewable resources
<b>Organic</b>	Organic
<b>Recycle</b>	Recyclable, recycled content, recycling symbols. Note that recycle claims do not include instructional claims such as “please recycle”
<b>Advisory</b>	Category additionally created from the categories above for further analysis – includes claims that could be argued to not relate to an environmental benefit (e.g. recycling symbols, ‘please recycle’ or ‘recyclable’)

The products sampled were selected as typical products a consumer might see and/or buy on an average shopping trip; the specific products chosen are listed in the Methodology section of this report, along with the selection method. The hierarchy of product sampling is represented in Figure 1, which also shows the terminology used in this report.

**Figure 1. Product Sampling Hierarchy**





## 2 Key Findings

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### 2.1 Environmental Claims

#### How Common were Environmental Claims?

- About 2/3 of the items had at least one environmental claim, dropping to under half if advisory claims are excluded.
- Just 1/2 of the claims seen were about recycling, and most (97%) of the recycling claims were about product packaging. Recycling claims were much less significant if advice or instructions were not considered a claim.
- *Where there's one, there's two*: for items with a claim, the average number of claims per item was 2.2.
- *No sector was untouched*; every product sector had at least one item with a claim.

**Claims are widespread.** The number of items with green claims in the 32 products<sup>2</sup> sampled was high. On average, about two thirds (63%) of the 3,234 items viewed had at least one green claim. Of the 4,492 claims observed in total, almost half (42%) were related to *recycling* (including 'recyclable' or 'recycled content'), and in particular the recyclability of the product packaging. However, if advisory claims (e.g. claims not specifically related to a specific environmental attribute of the product), are excluded, then just under half of items have at least 1 green claim. The proportion of *recycling* claims decreases from 42% to 2% if advisory claims are excluded. See Section 4.1 in the technical annexe for more information.

**Some market sectors were more likely to have higher levels of claims than others.** The frequency of green claims varied widely, depending on the market sector. When including advisory claims almost all (95%) of the items in the *personal care* sector had a green claim while only about one in five (19%) had a green claim in *tourism* and *banking*. However, if advisory claims are excluded, this 95% drops to 9%. In addition, the market sector with the highest percentage of claims then becomes *clothing* at 28%, again suggesting that many claims are advisory in nature. See Section 4.2 in the technical annexe for more information.

**Five products had claims on all items sampled, and 1/3 of the products had claims on 9 out of 10 items sampled.** The frequency of green claims varied significantly by product. Five products (*cars, household surface cleaners, bottled water, baby food, and paint*) had at least one green claim on every item viewed. *Shampoo, milk, body lotion, nappies, washing machines, fabric washing products, and windows* had at least one green claim on almost every item viewed (90%). Over two thirds of the products sampled had a green claim on over half of the items viewed. However, the frequency of claims on most of these products drops significantly if advisory claims are excluded, indicating that a high proportion of claims were in relation to advice, often in the disposal of packaging. The exceptions are *cars* and

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<sup>2</sup> Products include both goods and services.

*windows*, which could be predicted as being less affected as they come with little or no packaging. See Section 4.2 in the technical annexe for more information.

### A Snapshot of What a Consumer Might See

On a typical shopping trip like this one, a UK consumer would be *very likely* to see...

- A wide variety of environmental claims.
- At least one environmental claim on *almost every* personal care item but most of these are likely to be advisory.
- At least one environmental claim on *most* household products and food items – but again, many will be advisory.
- A mark (either the Green Dot or Mobius Loop) related to the recyclability of the product's packaging.

**Recycle claims were the most common and were three times higher than General (e.g. 'natural' or 'eco-friendly') or Efficiency (e.g. 'energy efficient') environmental claims.** Most of the *recycle* claims (97%) applied to the packaging material or the hang tag, not necessarily to the product itself. However, *efficiency* and *general* claims become the most frequent if those considered *advisory* are excluded, as 95% of *recycle* claims are advice or informational in nature. Claims about *water*, *biodegradability*, *environmental causes* (e.g. donations to a particular charity), or around a products *life cycle* were infrequent. See Section 4.2 in the technical annexe for more information.

**Consumers are likely to see a wide variety of claims on a typical shopping trip.** Some products or services had a wide variety of claims. For example, *fabric washing products*, *T-shirts*, *jackets*, *cars*, and *household surface cleaner* had the highest diversity of claims (six or nine of the 13 different claims categories were observed). Conversely, *WC's* and *lipstick* only had one type of claim (*water* and *recycle*, respectively). The *clothing*, *household*, and *food and drink* sectors had the highest diversity of claims. Of the 13 different types of claims, *general* and *recycle* were most frequently encountered across the greatest number of products and services. See Section 4.4 in the technical annexe for more information.

**Third party logos were common; self-made logos were less so.** A small percentage (only 2% of all claims) were self-made logos. These self-made logos were found on a small array of products; fewer than half of all the products sampled had self-made logos. *Environmental cause* claims had the highest percentage of self-made logos. Slightly more than half (53%) of claims were third party logos and about 1/3 of third party logos were verified or checked by an independent party as complying with the stated criteria or standard. As noted above, most of the logos were advisory recycling logos (e.g., Green Dot, Mobius loop, and Plastic Mobius). When these advisory logos are excluded from the analysis, the majority of the logos were those administered by a governmental organisation or by a third party independent organisation. See Section 4.4 in the technical annexe for more information.

**Inferred environmental claims, such as images of nature, were displayed to the consumer in many, but not all, product sectors.** Images of nature were the most common type of inferred claim, and include images of leaves, trees, grass, landscapes, planets, and green loops. About two-thirds of the 32 products and services had at least one inferred claim.

All of the internet products and services had inferred claims. The analysis of inferred claims was independent of the overall analysis of environmental claims. See Section 4.5 in the technical annexe for more information.

**A small percentage of the claims were mandatory energy labels, CO<sub>2</sub> emission ratings, or organic claims.** Overall, about 10% of the total observed claims were mandatory claims as required by UK regulation or policy, however, the exact percentage of mandatory claims depends on the sectors chosen for sampling, so this may not be representative. It is difficult to draw any conclusions about whether mandatory claim requirements are encouraging further green claims. The *efficiency* and *organic* claim categories had products with mandatory requirements. See Section 5 in the technical annexe for more information.

### **Further Analysis**

65 claims (5 from each of the 13 different claim categories, e.g. *water, recycle, carbon/climate*) were investigated in more detail to provide some context to the claim being made. This included further investigation of the brand's website. The following observations were noted:

**Fewer than half of the 65 claims investigated in more detail provided readily available information on the product for the basis for the claim.** The *air, general, and materials* claim categories were the least likely to have some basis for the claim.

**Many companies making claims provide public reports on sustainability programs.** For the selected 65 claims investigated in more detail, more than half of the companies making the claim prepared an annual environmental or sustainability report. Categories where most claims were made by companies with an environmental report were *cause, efficiency, organic, and recycle*.

**Most of the 65 claims investigated in more detail do not address environmental benefits across all phases of the product's life cycle.** The use of the product was most frequently associated with the claim. Therefore, this aspect of the subset is unlikely to be representative of claims as a whole, since the majority of the overall claims are based around recycling (i.e. the end-of-life or disposal phase).

## **2.2 How Well Aligned Are the Claims with the Current Green Claims Code?**

The purpose of this study was not to evaluate the validity of claims; however, several observations can be made about how well the claims align with certain general elements of the code.

### **Clear or Confusing?**

*Defra guidance notes, "A green claim should be clear about what environmental issue or aspect of the product the claim refers to."*

Many claims were located on the product's packaging but it was not always clear whether the claim applied to the packaging or to the product, or both. Since over 1/3 of the claims referred only to the packaging this would be an important aspect to make clear.

For textile articles, some claims were printed on the article's hang tag. For some products, the hang tag clearly specified that the claim was about the hang tag – not the product – by noting that the manufacturer had an “eco-friendly hang tag program”. However, many hang tags included claims regarding the use of soy ink, or other environmental messages that some consumers might think referred to the article itself – not the hang tag.

### **Vague or Specific?**

*Defra guidance notes, “A green claim should not be vague or ambiguous, for instance by simply trying to give a good impression about general concern for the environment. Claims should always avoid the vague use of terms such as “sustainable, “green”... likewise they should avoid linking vague descriptions, such as “friendly” or “kind” with words like “earth”, “nature”, “environment”, “eco”....*

About 1 in 10 of the total 4,492 claims were general, non-specific environmental claims that are considered vague under Defra guidance. Examples of the wording on these claims are “eco-function”, “natural”, “eco-friendly”, “eco-classic”, or “safe for the environment”. Without investigating further, a consumer would not be able to understand the basis for these claims, and the extent to which these products have an environmental benefit was not clearly specified on the product or its packaging.





























### **Explicit Symbols?**

*Defra guidance notes, “A green claim should be explicit about the meaning of any symbol used in the claim – unless the symbol is required by law, or is backed up by regulations or standards, or is part of an independent certification scheme.*

Pictures of the environmental logos observed in this study can be found in Figure 2.

Only a small percentage (2%) of claims were made with self-made logos. However, 23% of products were marked with the Green Dot logo. Some consumers could think the Green Dot provides environmental benefits because of its name (i.e., “green”) and because its green imagery with arrows is similar to the widely used recycling Mobius loop. The Green Dot symbol was found on a wide variety of product packages, however it does not refer to the recyclability of the product or packaging but to an EU package recovery scheme that is not applicable in the UK. The product may still be recyclable, but this is not indicated by the presence or absence of the Green Dot.

Figure 2

	The Green Dot		Volatile Organic Compounds Logo
	PET		Nordic Swan Logo
	Plastic Mobius Loop		LEAF Marque Logo
	PETE HOPE V		Marine Conservation Society Logo
	PP PS OTHER		Small Change Big Difference Logo
	Mobius Loop		Woodland Trust Logo
	Glass Recycling Logo		ENCAMS Logo
	Recyclable Steel Logo		Washright Logo
	Recyclable Aluminum Logo		Energy Star Logo
	Tidy Man Logo		Energy Efficiency Rating Logo
	New Packaging Symbols		CO2 Emissions Rating Logo
	Compostable Logo (EN Standards)		Energy Savings Trust/ Energy Saving Recommended Logo
	Compostable Logo		energikare Logo
	Soil Association Logo		
	Organic Farmers & Growers Logo		
	Forest Stewardship Council Logo		
	Tees for Trees Logo		

## A Snapshot of What the Consumer Might Perceive

On a typical shopping trip like this one, a UK consumer would be likely to perceive that...

- Claims refer to the product, when in fact many refer to the packaging or hang tag.
- The roughly 10% of *general* claims they see ('eco-friendly', etc.) are meaningful about the product's environmental benefits, although the Green Claims Code would consider them vague or ambiguous.
- Widely used Green Dot logo suggests a product can be recycled when actually the Green Dot does not refer to the recyclability of a product or its packaging.

### Technical Terminology Suggesting Environmental Benefits?

Environmental claims that may appear robust, but in fact may imply more than they actually cover were infrequently observed; examples include:

- "only brand with ISO14001 on all its products"
- 100% biodegradable and 100% compostable rubbish bags
- "One virtual tree planted for every purchase" for using credit cards, or "plant a virtual tree" by riding the rail
- "We work with farmers to improve environmental sustainability"

Without further detailed investigation or an understanding of the scientific or technical terms used, a consumer may not be able to understand the basis for these claims. Because of the scientific or technical terms used in the claim some consumers may infer that the product has significant environmental benefits. For example, ISO 14001 certification is not relevant for a product and confers no particular environmental benefit; a consumer unfamiliar with the ISO standard may perceive that there is in fact some relevance.

### 3 Methods, Limitations, and Data Summary

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The scope of the work included a scan of literature and “mystery shopping” at 30 stores in the Sheffield, UK area and at 100 Internet sites during the period 20 April through 1 May 2009. During that time, a total of 3,234 items were viewed and 4,492 environmental claims were tallied. All brands of interest on the shelf in each store were scanned. The analysts stopped sampling when no additional unique claims were identified. For products bought on the internet, such as electricity or hotels, brands were selected based on whether they were available to the UK consumer and accessible within a 15 minute internet search. Therefore, different numbers of items were sampled for each product, which reflected the different product selections available to the consumer.

The second phase of the work included a desktop investigation of 65 of the green claims to more fully understand their basis and context. Five claims were selected from each of the 13 claim categories (e.g. *carbon/climate*, *water*, *recycle*), giving a total of 65 claims, to represent a ‘snapshot’ of green claims typically viewed by consumers, using the following criteria:

1. Most frequently observed claim,
2. Claim with a third-party logo,
3. Claim with a self-made logo,
4. Claim with only one or two words or a very short phrase, and
5. Claim with lengthy verbiage.

Where there was no claim to represent one of the five criteria, steps 1 to 5 were repeated to determine the next most frequent claim.

The intent in selecting products and services for sampling was to create a “snapshot” of “typical” products and services purchased by UK consumers either in stores or on the Internet. The rationale for identifying market sectors and products is described in the technical report, and Figure 3 illustrates the sampling hierarchy and the 10 market sectors and 32 product sectors sampled. Environmental claims on the items were tallied in 13 claim categories, as shown on the following page.

**Figure 3. Product Sampling Hierarchy and Claim Categories**



Detailed sampling and recording procedures are provided in the full Technical Report; however the following assumptions and limitations are noted.

- The findings in this study are representative of the sectors and products sampled, however, it cannot be assumed that these products are representative of all those that a consumer might purchase.
- The environmental claims and products sampled are a snapshot of conditions at the time and locations sampled in Sheffield. It was assumed the items are representative of products across the UK. The exact number of environmental claims on items sampled at different stores on different dates may vary from what is presented here.
- Only five individual claims from each claim category were selected for the more detailed content analysis; we have assumed that these claims provide a representative snapshot of all the claims. Therefore, it is unknown whether the analysis is representative of all claims.

The complete sampling results are summarized in the table on the following page, and described in detail in the Technical Report.



**Table 2. Data Summary**

Market Sector	Product or Service	No. of Brands	No. of Brands with Claim	No. of Items	No. of Items with Claim	No. of Items without Claim	Number of Claims	Ave. Claims per Item	Ave. Claims per Item (with a Claim) <sup>3</sup>	% of Items with a Claim
Banking	Credit Cards	21	5	73	14	59	20	0.3	1.4	19%
Building & Home	Carpeting	22	10	203	46	157	53	0.3	1.2	23%
Building & Home	Hardwood Flooring	9	4	58	40	18	54	0.9	1.4	69%
Building & Home	Paint	10	10	73	73	0	284	3.9	3.9	100%
Building & Home	WCs	8	1	141	37	104	37	0.3	1.0	26%
Building & Home	Windows	9	7	78	70	8	181	2.3	2.6	90%
Clothing	Babygro	11	8	262	91	171	113	0.4	1.2	35%
Clothing	Jackets	10	4	91	30	61	128	1.4	4.3	33%
Clothing	Jeans	13	9	343	159	184	217	0.6	1.4	46%
Clothing	T-shirts	16	16	212	177	35	259	1.2	1.5	83%
Electronics	Laptop Computers	13	9	45	19	26	21	0.5	1.1	42%
Electronics	Washing Machines	13	7	83	80	17	156	1.1	2.0	96%
Energy	Electricity	7	13	24	7	3	26	1.9	3.7	29%
Food & Drink	Baby Food	8	8	182	182	0	576	3.2	3.2	100%
Food & Drink	Bottled water	11	11	26	26	0	51	2.0	2.0	100%
Food & Drink	Chicken	13	11	112	62	50	115	1.0	1.9	55%
Food & Drink	Milk	9	8	52	51	1	122	2.3	2.4	98%
Food & Drink	Tomatoes	11	11	57	49	8	85	1.5	1.7	86%

<sup>3</sup> This value includes only those items with green claims; it is the average number of claims per item, but only for those items with green claims.

**Table 2. Data Summary**

Market Sector	Product or Service	No. of Brands	No. of Brands with Claim	No. of Items	No. of Items with Claim	No. of Items without Claim	Number of Claims	Ave. Claims per Item	Ave. Claims per Item (with a Claim) <sup>4</sup>	% of Items with a Claim
Household	Fab. Wash. Products	11	11	101	95	6	359	3.6	3.8	94%
Household	HH Surface Cleaner	15	15	93	93	0	199	2.1	2.1	100%
Household	Light Bulbs	12	11	150	134	16	348	2.3	2.6	89%
Household	Rubbish Bags	13	9	54	48	6	108	2.0	2.3	89%
Household	Toilet Tissue	7	7	18	16	2	38	2.1	2.4	89%
Personal Care	Body Lotion	10	10	41	40	1	63	1.5	1.6	98%
Personal Care	Lipstick	10	8	52	39	13	39	0.8	1.0	75%
Personal Care	Nappies	7	7	37	36	1	125	3.4	3.5	97%
Personal Care	Shampoo	24	24	162	161	1	276	1.7	1.7	99%
Tourism	Hotel	16	3	16	3	13	6	0.4	2.0	19%
Transportation	Airlines	12	8	12	8	4	16	1.3	2.0	67%
Transportation	Cars	10	10	113	113	0	373	3.3	3.3	100%
Transportation	Rail	15	5	15	5	10	21	1.4	4.2	33%
Transportation	Tyres	16	10	255	23	232	23	0.1	1.0	9%
<b>Total</b>	<b>32</b>	<b>392<sup>5</sup></b>	<b>290</b>	<b>3,234</b>	<b>2,027</b>	<b>1,207</b>	<b>4,492</b>	<b>1.4 (Ave)</b>	<b>2.2 (Ave)</b>	<b>63% (Ave.)</b>

<sup>4</sup> This value includes only those items with green claims; it is the average number of claims per item, but only for those items with green claims.

<sup>5</sup> This value is the sum of the number of brands in each category. Some brands may be double counted; for example certain store brands were sampled for both chicken and tomatoes.