

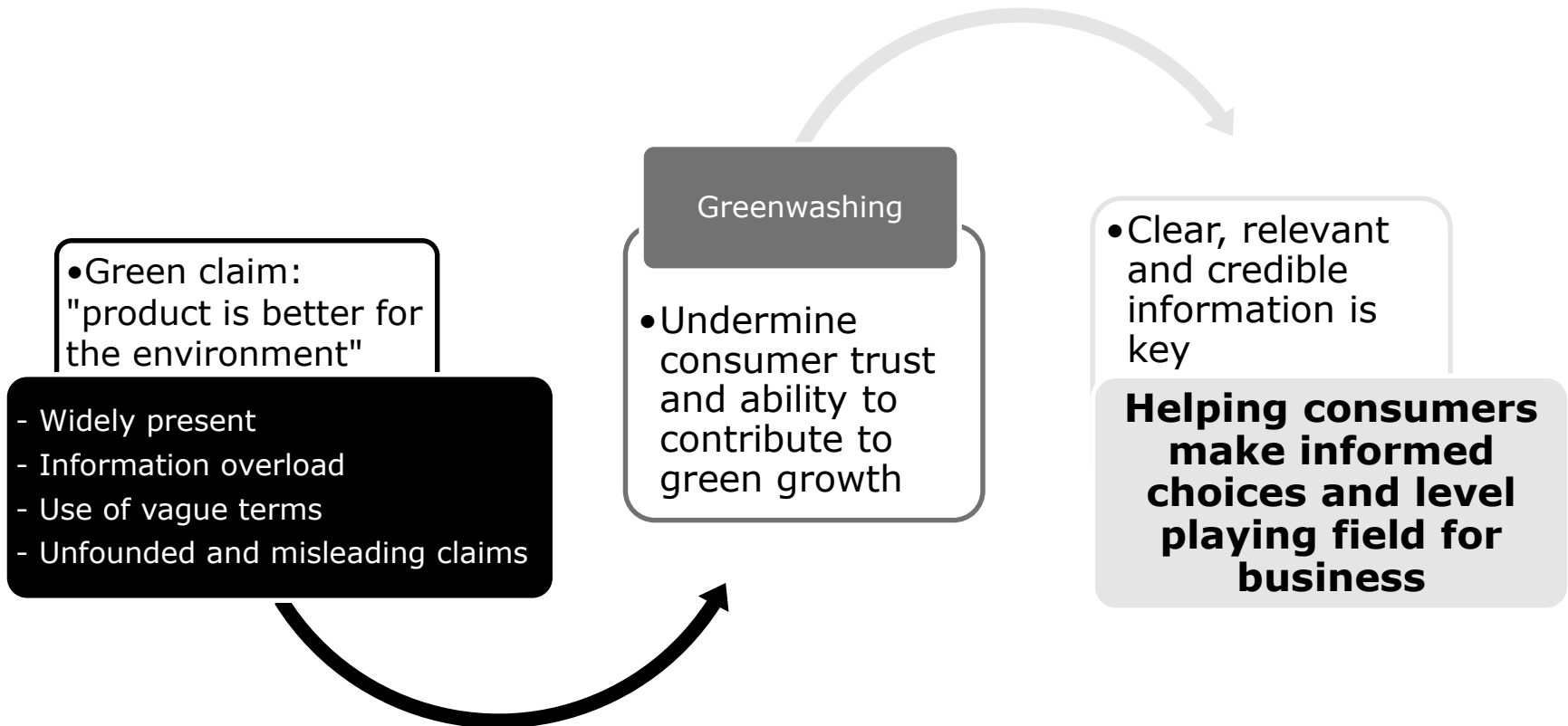


# Presentation of the work of the Multi-stakeholder Dialogue on Environmental Claims

**WORKSHOP ON THE REVISION OF THE UCPD  
GUIDANCE**

**09/09/2015**

# Why a focus on Green Claims?



## Our work so far

May 2012: Set up of Multi-stakeholder Dialogue

March 2013: Report and recommendations presented at 2013 Consumer Summit

September 2015: Publication of in-depth consumer market study on environmental claims (non-food)

Multi-stakeholder advice with compliance criteria + Review process UCPD guidance

# Main results of green claims study



## Landscape

- Green claims are widespread
- Different types of claims
  - Messages/text
  - Logos/symbols
  - Implicit claims (colours, images)



## Consumer perception

- Low level of understanding
- Awareness is mixed
- Mistrust in environmental information is common
- Unable to differentiate between third-party verified labels and self-declared labels



## Compliance/enforcement

- Issues of possible non-compliance
- Enforcement not always priority
- National/sectorial guidelines on environmental claims positive
- Self-regulatory systems considered effective (in particular advertising)

### 1. Content of the Claim

*"In order not to be misleading, environmental claims should reflect a verifiable environmental benefit or improvement and this should be communicated in a precise manner to consumers."*

- Consider **main** environmental impacts (life-cycle approach)
- Clarity on **which aspects** the claim refers to
- Claim should be **meaningful** in the relevant market
- **No transfer** of environmental impacts (the aspect highlighted should lower the total net environmental impact of the product)
- **Comparative advertising** only with products serving the same function, using the same methods and assumptions for comparison
- Claim should always **exceed minimum legal requirements**

## 2. Clear and accurate presentation

Ensure correct and truthful overall impression for consumers by using **accurate, clear, specific, unambiguous** language

- Overall product presentation (wording, imagery...) should be truthful and accurate → **no overstatement** of the benefit
- **Scope and boundaries** of the claim should be clear
- **Avoid vague, ambiguous and broad "general environmental benefit" claims**  
E.g. "eco-friendly", "sustainable", "good for the environment"  
→ **Still OK under certain conditions, e.g. when clear and prominent qualifying language provided**
- **Private labelling** schemes: demonstrate clear environmental benefits, criteria publicly available etc.
- **Avoid black listed practices - Annex I of UCPD**

### 3. Claim substantiation and documentation

Claim must be based on **robust, independent** and **generally recognized scientific evidence**.

- On request, **national competent bodies** should **receive/have access to all relevant information** (including confidential)
- **Independent third party testing** should be made available if the claim is challenged
- **Regular review** of claims needed **in view of technological developments**
- Claims should concern **achievements** rather than future **aspirations**
- **Claims in company/product names** have same documentation requirements as other claims
- Evidence to be retained **for a reasonable period**
- **Transparency to public** in making relevant info available

### Providing further transparency beyond legal requirements

- Provide public with a **reasonably detailed explanation** of environmental claims, including information on how these have been documented
- Make **entire documentation** supporting the environmental claims available to the public (subject to confidentiality considerations)
- **Do not make the claim** if the information needed to verify it is confidential
- Consider **independent verification** and assurance **as default option**





# Thank you for your attention

**Study on environmental claims:**

**[http://ec.europa.eu/consumers/consumer\\_evidence/market\\_studies/environmental\\_claims](http://ec.europa.eu/consumers/consumer_evidence/market_studies/environmental_claims)**

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