

How to avoid greenwashing

A guide for reviewers of environmental claims about products and services

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“Greenwashing” is the term used to describe the misstatement of the environmental benefits of products or services, thereby misleading consumers. Accusations of greenwashing have exploded in the last couple of years as manufacturers and advertisers respond to growing consumer interest in environmental factors by making green claims. Such claims are facing increasing scrutiny from consumers, activists and regulators.

Tackling greenwashing is a priority for both the Competition & Markets Authority (CMA) and the Advertising Standards Agency (ASA).

This guide provides a step-by-step overview of the relevant considerations when reviewing environmental claims about products or services, adopting the framework in the CMA’s Green Claims Code. Examples are provided of claims that have been held to be misleading, in order to provide users with practical guidance and illustrate the stringent standards being applied by regulators.

The guidance below is general in nature. Sector-specific and technical requirements must be considered and applied in addition to the guidance below (for example, energy-efficiency labelling requirements, organic certifications rules for food products and financial reporting requirements).

Reviewer checklist

The first step is to identify all environmental claims being made. Claims are communicated in a number of ways: advertising campaigns, product names, product literature, labelling, logos and packaging. Images and visual representations are relevant, in addition to use of language.

The following checklist should be applied to each claim.

Is the claim truthful and accurate?

It goes without saying that claims must not be false or deliberately deceptive. In addition, claims must not create an inaccurate impression of the overall environmental impact of the product or service, even if factually correct language is used.

Labelling a product as containing “50% more recycled material” is likely to convey a false overall impression if the product only contained 1% recycled material previously.

Is the claim clear and unambiguous?

Broad and general claims in buzzwords such as “eco-friendly”, “green”, “sustainable” and “natural” are more likely to mislead. The risk is that these terms suggest that a product or service has an overall positive environmental impact (or at least no adverse impact), especially if used without explanation.

Explanations, particularly if provided in small print, may be insufficient to detract from the overall impression.

Adverts claiming plant-based drinks products were “good for the planet” were banned by the ASA because the phrase was ambiguous and could be interpreted in different ways.

Is overstatement avoided?

Claims should be factual and measured. Be particularly careful with claims relating to future ambitions. Such claims must be realistic and accompanied by a clear and deliverable strategy. Be honest about progress and where more needs to be done.

An advert for a hydrogen fuel cell car which claimed that the car “purifies the air as it goes” was considered by the ASA to be misleading. Although the car had an air purification system, the advert did not take account of the fact that particulates as a result of brake and tyre wear would be released into the air.

Is important information omitted?

Ensure that claims include all the information consumers need to make an informed choice, and not just some of it. Cherry picking information to promote the positive aspects of a product while ignoring the negative is likely to mislead.

An advert for a drinks product claiming its plastic bottles were “100% recycled plastic” with an explanation in small print that the claim “excludes cap and label” was considered to be misleading.

Are any comparisons fair and meaningful?

It should be clear to consumers what is being compared and how the comparison has been made.

Comparisons should compare like with like. They should be fair and representative of products offered (rather than, for example, being based on a limited sample from a product range).

An airline’s campaign claiming to be Europe’s “lowest emissions airline” was banned due to reliance on out-of-date information and failure to include some well-known airlines in substantiating the evidence.

Has the claim being substantiated?

Robust, credible and up-to-date evidence is required to support all claims.

A supermarket’s advert promoting items in its plant-based product range as “better for the planet” was banned by the ASA because the supermarket held no evidence of the full life cycle of products in the range, including the source of the ingredients and production processes. It was therefore unable to substantiate its claims.

Does the claim consider the full lifecycle of the product or service?

Recognise that the impact of a product on the environment is affected by a wide range of factors, including the locality of the materials used, the production processes, packaging, transportation, use and disposal.

Do not focus on a narrow set of attributes to the exclusion of other considerations.

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