

ICC Framework For Responsible Environmental Marketing Communications

**[Month], 2025]**

# Introduction and Background

As the world’s largest business organization, the International Chamber of Commerce (ICC) promotes high standards of business ethics through the development and dissemination of codes and guidance on responsible marketing and advertising communications. One of ICC’s landmark achievements is the ICC Advertising and Marketing Communications Code (Code). First adopted in 1937 and updated many times since then (most recently in 2024), the Code provides practical guidance to advertising industry stakeholders, including advertisers and advertising agencies, as well as to self-regulatory advertising organisations and national governments. By promoting self- regulation in the business sector in accordance with globally recognised high ethical and legal standards, consumers can be confident that businesses abiding by the Code and related ICC Guidance can be relied upon to provide truthful advertising, thus fostering a robust marketplace that both enhances creativity and preserves consumer trust.

The ICC Code sets forth general principles governing marketing communications of all types and in all media. It includes a separate section, Chapter D, on environmental marketing communications.

For many years, the General Code and Chapter D have been augmented by the ICC Framework for Responsible Environmental Marketing Communications (Environmental Framework), which serves as a practical guide to advertisers, self-regulatory organisations and the broader advertising ecosystem, in addressing environmental claims, including aspirational claims, to assure that claims are truthful and not misleading and are appropriately substantiated. The updated 2025 Framework continues to reflect the longstanding principle that all claims, including environmental claims, are evaluated in the context in which they appear and that marketers should consider the net impression of the claim as a whole. The ICC Code and this Framework thus provide a roadmap for global marketers in developing environmental claims and campaigns. Like the Code itself, the Environmental Framework sets out general principles for environmental marketing claims, but also provides added context on some specific environmental and related claims relevant to marketers today. And, like the Code, the Framework does not universally apply to all forms of corporate communications, For example, it may not cover corporate public affairs messaging in press releases and media statements, information contained within annual reports, or details mandated for product labels.

# Significant changes

The updated 2021 Environmental Framework provided added guidance on some established environmental claims and additional guidance on some emerging claims, including some climate claims, circularity claims, “free-of” claims, recyclabiility and recycled content claims, and degradable claims. This 2025 update provides guidance on some other environment and social governance (ESG) extended producer responsibility (EPR) marketing communications and commitments.

As not all terms are subject to globally agreed definitions or criteria, the 2025 Framework does not attempt to offer specific definitions in all instances. And, like the updated 2024 ICC Code, the 2025 Framework does not adopt or adhere to any particular standard or government framework. Rather, the Framework reminds marketers to take steps to assure that all environmental claims are clear and appropriately substantiated by sound scientific evidence. As with all guidance issued by the ICC Marketing and Advertising Commission, the Environmental Framework is grounded in the principle that freedom of commercial speech in the sale of all legal products and services is a fundamental tenet of free markets. Free markets promote innovation, economic development and competition as companies compete to provide consumers with products and services that reflect their interests and concerns and offer them a range of choices. The global business community is keenly aware that the proper functioning of a free-market economy depends on consumers receiving accurate and truthful information about products, services or operations.

It is a fundamental requirement of the ICC Code that claims should be truthful. non-misleading, clear, and substantiated. Exaggerated, unsubstantiated claims may deceive consumers into falsely believing the marketer’s products, services or operations are environmentally sound, undermining consumer confidence, penalizing marketers who adhere to appropriate guidelines, and prompting interest in imposing regulatory restrictions that may have the effect of limiting the flow of truthful information relevant to consumers.

Terms Specific to Environmental Claims

**Chapter D** defines a few specific general environmental terms for purposes of the Chapter.Terms specific to environmental claims should be read in conjunction with the general definitions contained in section 3 of the Code, as should terms discussed in the Framework:

• **“environmental aspect”** or **“environmental attribute”** means an element of an organisation’s activities or products that have an impact on the environment

• **“environmental claim”** means any statement, symbol, sound, or graphic that indicates or implies an environmental aspect of a product, a component or ingredient of it, packaging or constituent of it, or an activity, facility or operation

• **“environmental impact”** means any change to the environment, whether adverse or beneficial, wholly, or partially resulting from an organisation’s activities or products

• **“life cycle”** means consecutive and interlinked stages of a product system, from raw material acquisition or generation of natural resources to final disposal

• **“product”** as defined in the general definitions of this Code includes any goods or services. “Product” normally includes the wrapping, container etc. in which the goods are delivered. However, in the environmental context it is often appropriate to refer separately to the packaging, which then means any material that is used to protect or contain a product during transportation, storage, marketing or use

• **“qualification”** means an explanatory statement that accurately and truthfully describes the limits of the claim

• **“waste”** refers to anything for which the generator or holder has no further use, and which is discarded or released into the environment

# Purpose and Application

The Environmental Framework provides a summary of the principles of the ICC Code including those outlined in Chapter D on environmental claims and supplements them with additional commentary and guidance to aid practitioners in applying established principles governing marketing communications generally to environmental claims. Chapter D of the Code was initially drafted after a broad review of relevant global guidance on environmental marketing around the world. Recognising that there are many other sources of guidance on environmental claims, as well as hundreds of test methods and standards that may be considered, ICC does not endorse or require adoption of any specific national or international standard or method. Instead, the Framework, like the ICC Code itself, requires that claims must be consistent

with applicable law in the relevant region, and supported by appropriate substantiating data. For environmental claims, the ICC Code requires reliable scientific evidence.

Environmental claims refer to any statements, symbols, images or graphics that convey an environmental aspect of a product, component, package, service or company’s business operations. Truthful and accurate environmental claims, qualified as needed, convey relevant information to consumers and the market. However, marketing communications should not contain any statement or visual treatment (including colour, signs, symbols, images, logos, etc.) likely to mislead consumers in any way about environmental aspects or advantages of the advertised product, component, package or service, or about actions being taken by the marketer in favour of the environment or the climate. The ICC Code’s requirement that “Marketing communications should be truthful and not misleading” does not imply that all marketing communications that include claims about the environment must address every conceivable impact on the environment or require conducting a full life cycle analysis (LCA) as an essential prerequisite. An LCA is appropriate where an unqualified general environmental claim is made, which typically suggests that the claim relates to the entire life

**1** Sources reviewed include the International Standards Organization (ISO) 14021 standard, the U.S. Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims, the EU guideline for the Unfair Commercial Practices Directive, updated proposed guidance issued by the Canadian Competition, and other guidelines and standards on environmental claims.

cycle of a product, component, or package.

The Environmental Framework provides added guidance and commentary to help marketers understand how to apply principles of substantiation and qualification to a number of specific environmental terms used in advertising. However, the general principles of ethical advertising apply regardless of whether a specific term is referenced in the Code (including Chapter D) or this Framework.

## Digital scope and application

The Framework, like the ICC Code itself, covers all forms of advertising and marketing communications claims, including digital advertising and social media. It is technology and media neutral. It applies to the entire marketing eco-system, guiding communications practitioners, advertising agencies, publishers, media owners, contractors and other participants including market influencers, bloggers, vloggers, affiliate networks, data analytics, ad tech companies, and those responsible for preparing algorithms and artificial intelligence technologies for marketing communications purposes.

References to products include digital ones.

# Conclusion

As a leader in responsible marketing worldwide, the ICC intends that the ICC Code and the Environmental Framework serve as a practical and useful resource to practitioners.

Users should remember that environmental claims—whether or not specifically discussed in the Code or this Environmental Framework—should meet the letter and spirit of the principles of the Code, as well as applicable local legal and regulatory requirements. The intent in providing this 2025 updated Environmental Framework is to provide a resource for advertising industry stakeholders in meeting their responsibilities to provide truthful and appropriately supported environmental claims.

## How to use this guidance

**Part 1** of this Environmental Framework provides a comparative chart identifying relevant general provisions from the ICC Code in column 1, relevant provisions from Chapter D of the Code in column 2, and added commentary, observations and suggestions in column 3.

**Part 2** of this Environmental Framework describes a number of specific environmental claims or terms in column 1, and application of ICC principles and other considerations when such terms are used in marketing communications in column 2.

**Annex 1** is a checklist that marketers may find useful in evaluating their environmental claims. While this Framework provides guidance on a number of popular terms in environmental advertising,

the terms covered are not intended to be an exclusive or exhaustive list of possible environmental claims. Regardless of whether or not a specific claim is defined in this Framework, good advertising principles set forth in the ICC Code should be followed and should reflect the core principle of the ICC Code: all claims must be legal, decent, honest and truthful.



# ICC Framework for Responsible Environmental Marketing Communications

**Part 1** of this Environmental Framework provides a comparative chart identifying relevant general provisions from the ICC Code in column 1, relevant provisions from Chapter D of the Code in column 2, and added commentary, observations and suggestions in column 3. **Part 2** of this Environmental Framework describes a number of specific environmental claims or terms in column 1, and application of ICC principles and other considerations when such terms are used in marketing communications in column 2. **Annex 1** is a checklist that marketers may find useful in evaluating their environmental claims. While this Framework provides guidance on a number of popular terms in environmental advertising, the terms covered are not intended to be an exclusive or exhaustive list of possible environmental claims. Regardless of whether or not a specific claim is defined in this Framework, good advertising principles set forth in the ICC Code should be followed and should reflect the core principle of the ICC Code: all claims must be legal, decent, honest and truthful.

# **Part 1** Existing ICC code provisions on environmental marketing and suggested considerations for practitioners

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**Part 1** of the 2025 Environmental Framework draws directly from existing provisions in the 2024 ICC Code and Chapter D, respectively. The guidance in column three reflects recommendations of the ICC Commission on Marketing and Advertising on some practical ways to implement the provisions of the Code and Chapter D for the specific environmental claim identified.

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| **ICC Principles**  General Provisions on Advertising and Marketing Communication Practice | **ICC Principles**  Chapter D—Environmental Claims in Marketing Communications | **Other Considerations**  in Environmental Marketing Communications |
| **Article 1: Basic Principles**  All marketing communications should be legal, decent, honest, and truthful. | **Article D 2.: Honest and truthful presentation**  Environmental marketing communications should be framed so as neither to take advantage of consumers’ concern for the environment nor exploit their possible lack of environmental knowledge.  **Article D.2.1 Honest and truthful presentation; General approach**  Marketing communications should not contain any environmental claims which are likely to mislead consumers in any way about environmental aspects or advantages ofwhat’s being communicated, or about actions being taken by the marketer in favour of the environment.  Marketing communications should not overstate environmental attributes, such as highlighting a marginal improvement as a major gain or using statistics in a misleading manner e.g. claiming “we have doubled the recycled content of our product” when there was only a small percentage of recycled content used to begin with. | The starting point for the evaluation of any environmental claim in a marketing communication is the applicable legal framework in which the claim will be made. Marketers should comply with applicable environmental requirements, including advertising or labelling requirements mandated by law, such as energy testing and labelling requirements for, e.g., appliances, insulation, light bulbs, or car mileage. Specific environmental claims may also  be regulated at the local level, and such claims may have to be supported by specific tests or versions of tests.  Environmental claims must have a sound scientific basis; the level of substantiation generally required for environmental claims is reliable scientific evidence, which may include, in appropriate circumstances, internal or third-party test data, data drawn from peer-reviewed or other scientific studies, or other reliable sources that would be considered by experts in the field as relevant and probative. Substantiating data must reflect the environmental condition(s) or impact(s) being assessed in a realistic manner.  Both the express and implied messages that the typical consumer (sometimes referred to as “reasonable consumer”) or other intended audience takes away from the marketing communication must be supported. |

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| All marketing communications should be prepared with a due sense of social, environmental and professional responsibility, and should conform to the principles of fair competition, as generally accepted in business.  No communication should in the content and manner made undermine the public’s trust and confidence in marketing communications. | Marketing communications that refer to specific environmental claims should not imply, without appropriate substantiation, that they extend to the whole performance of a product, company, grouip, sector, or industry. Such specific claims should be qualified as needed to avoid a misleading impression, i.e., if the limited nature of the claim is not otherwise clear from the claim itself or the context in which the claim is presented, then the claim should be appropriately qualified.  **Article D.2.3 Honest and truthful presentation; Qualifications**  All qualifications should be clear, prominent and readily understandable; the qualification should be provided in close proximity to the claim being qualified, to ensure they are understood together. | Overstating the environmental, social or economic benefits of a product, service or activity, or failing to provide adequate  substantiation for such claims, poses great potential harm to the marketplace as a whole. Marketers should avoid claims that an environmental attribute is unique to a product, component,  package, service, or marketer’s business operations when it is in fact a legal requirement.  False, deceptive or misleading environmental claims (sometimes referred to as “greenwashing”) are no different from any other type of deceptive or misleading claim in marketing communications.  To maintain confidence both in marketing communications and in the self-regulation system, marketing communications  should respect the letter as well as the spirit of the ICC Code, this Framework, applicable legal requirements, and local and sectoral self-regulatory codes. |
| **Article 4: Honesty**  Marketing communications should be structured in a way that does not take advantage of consumer trust or exploit their inexperience or limited understanding.  Relevant factors that can affect consumers’ decisions should be communicated in a manner and at a time that allows them to consider them effectively. | **Article D2: Honest and truthful presentation**  Marketing communications should be framed so as neither to take advantage of consumers’ concern for the environment nor exploit their possible lack of environmental knowledge. | Where claims or terminology used in marketing communication might reasonably be interpreted by a consumer as environmental claims, they should be supported by reliable scientific evidence (cf. Article 6: Substantiation) and be consistent with definitions and concepts that would be accepted as reliable by experts in the field.  As broad environmental claims may be confusing to consumers, relevant qualifiers or disclaimers should be provided as necessary to avoid misleading consumers. Where qualifiers or disclaimers are needed, they should be clear, prominent and in close proximity to the claim so qualified. This Framework is not intended to limit or restrict marketers from offering additional useful information through website links, QR codes and other available means. For example, compostable for products compostable only in industrial facilities should be accompanied with an appropriate qualifier. Such a disclaimer could address the limited availability of such facilities, instructions to avoid home composting, and to dispose of in trash if composting facilities are not available. Additional information on the location of available facilities could be provided via a QR code. |

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| **Article 5: Truthfulness**  Marketing communications should not contain any claim likely to mislead the consumer, regardless of how it is conveyed – by text, sound, visual elements or any combinations thereof – and regardless of how the misleading effect occurs – directly or by implication, omission, ambiguity or exaggeration. The combination of elements used in a marketing communication provides the net impression of a claim and controls how it is interpreted. This applies especially, but is not limited to:   * Chatacteristics of the product which are material, i.e. likely to influence the consumer’s choice, such as the nature, composition, methods and date of manufacture, range of use, efficiency and performance, benefits, quantity, commercial or geographical origin, or environmental, social or economic impact... * Compliance with certification and standards or any other use of quality marks, logos (e.g. environmental, sustainable) or recognition symbols,,, | **Article D. 2.1 Honest and truthful presentation; General approach**  An environmental claim should be relevant to the specific focus of the marketing communication e.g. the products or activities in question. This should relate only to aspects or attributes that already exist or are likely to be realised during, for example, a product’s life, including customary and usual disposal or reasonably foreseeable improper disposal. It should be clear to what the claim relates, e.g. the product, a specific ingredient or aspect of the product, or its packaging or a specific constituent of the packaging, or the marketer’s facilities or operations. Aspirational claims should have reasonable plans in place to work in good faith towards achieving the stated aspiration, goal or commitment in the timeframe specified.  **Article D2.2: Honest and truthful presentation**  Vague or general non-specific claims of environmental benefit may convey a range of meanings to consumers. Such claims should be made only if they are valid, without qualification, in all reasonably foreseeable circumstances. Claims such as “environmentally friendly,” “ecologically safe,” “green,” “sustainable,” “carbon friendly” or any other claim implying that a product or an activity has no impact – or only a positive impact – on the environment, should not be used without qualification unless a very high standard of proof is available.  **Article D5: Product life cycle**  Environmental claims should not be presented in such a way as to imply that they relate to more stages of a product’s life cycle, or to more of its properties, than is justified by the evidence; it should be clear to which stage or which property a claim refers. A life-cycle benefits claim should be substantiated by a full life cycle analysis(cradle to grave). If an alternative lifecycle analysis is used (e.g., cradle to gate), the more limited scope of that life-cycle analysis should be disclosed.  **Article D6- Claims regarding components and elements**  When a claim refers to the reduction of components or elements having an  environmental impact, it should be clear what has been reduced. Such claims are justified only if they relate to alternative processes, components or elements which result in a meaningful environmental improvement.  Environmental claims generally should not be based on the absence of a component,  ingredient, feature or impact that has never been associated with the product category concerned. Such claims could be justified if they respond to potential misperceptions about the use of the identified component, ingredient, feature, or impact. If so qualifiers may be needed to avoid consumers being misled about the nature of the product, process, activity, etc. Conversely, generic features or ingredients, which are common to all or most products in the category concerned, or required by law, standards or otherwise, should not be presented as  if they were a unique or remarkable characteristic of the product being promoted. | Claims related to environmental, social or economic impact are generally considered material to consumers under Article 5 of the ICC Code. Information and claims about a product’s environmental attributes or environmental or social impact should be judged by the likely perception of the typical consumer. Scientific terminology or references are acceptable provided they are relevant and used in a way that can be readily understood by the typical consumer  to whom the message is directed. It should also be clear if the environmental claim refers to an entire or part of a product, component, package, service or company’s business operations.  Vague or non-specific claims (sometimes called “general” claims) include claims such as “environmentally friendly,” “good for the environment,” “ecologically safe,” “green,” “sustainable,” “carbon friendly,” “climate smart” or any other claims implying that a product or an activity has no impact—or only a positive impact—on the environment. The list provided is not exhaustive or exclusive; there are many other terms that may be deemed  a general claim. General environmental claims should not be used without qualification unless a very high standard of proof is available, or the claim is linked to a specific properly substantiated environmental attribute that clearly limits the scope of the claim to such attribute.  Claims should not state or imply that an improvement in performance is more significant than it is. For example, a claim that a component was produced with “30% lower carbon emissions” when the carbon emissions of the component are a small fraction of the emissions of the product as a whole would be misleading without qualification to contextualise the relatively low impact of the reduction in that specific component.  Copy, sound and visual presentations in marketing communication for products should accurately represent the material and related environmental characteristics of the product featured in the communication, such as:   * The nature and source of raw materials used to make the product. * The processing methods applied to the raw materials. * The product’s use of energy, or energy efficiency. * The contents and emissions of the finished product. * End of life disposal capabilities, such as recyclability or degradability. * Any other relevant and meaningful environmental aspects. |

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|  | **Article D7: Certifications, signs and symbols**  Environmental signs, logos, labels or symbols should be used in marketing communication only when the source of those signs or symbols is clearly indicated and there is no likelihood of confusion over their meaning, or when compulsory by law. Such signs and symbols should not be used in such a way as to falsely suggest official approval or independent third-party certification. | An unqualified “sustainability” claim may be understood to involve company actions beyond efforts to reduce environmental impacts. Claims may state or imply that the claim involves  social and economic impacts, such as support for fair working conditions, diversity and inclusion, communities or charities, orother social initiatives, as well. Marketers making general sustainability claims in advertising should be mindful that consumers may take away a broader corporate social responsibility message and must  substantiate all express and implied messages and qualify claims accordingly.  Marketing communications should be truthful in regard to standards that a product meets, or certification(s) that a product receives. The standards or tests should assess conditions of actual use or disposal of the product or package. |

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|  |  | Marketers should not use the names or logos of a government agency or third-party organisation in a manner that indicates or implies the marketers’ products or services, meet standards set by such agency or organisation if they do not. This is particularly important in jurisdictions that require the use of signs and symbols to communicate environmental attributes. Marketers are free to develop and apply their own standards and use a company-developed logo to convey that it meets the company’s standard provided they clearly convey that the environmental attributes of the product or service meet the company’s standards and not those of a government agency or third-party organisation.  Furthermore, company-developed logos should not resemble government agency or official third-party certification logos in a manner which could convey that government agencies or official third-party organisations certify the product or service. Qualifiers should be included as needed.  Marketers should not expressly or impliedly claim that the environmental attributes of the company, its processes, products or services have been verified by an independent third party if they have not. For example, marketing communication should not claim that a product has been certified as “organic” if the product has not received such certification, consistent with applicable legal standards, regulations and restrictions. |

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|  | **Article D4: Comparisons**  Any environmental claim should be specific and the basis for the comparison should be clear and understandable to reasonable consumers. Environmental superiority over competitors should be claimed only when an advantage can be demonstrated. Whatever is being compared in a marketing communication should meet the same needs and be intended for the same purpose. | Some environmental claims that are literally true may be misleading because they exaggerate the benefits of the product. For example, a claim that a product contains “twice as much recycled content as before” when the amount was very low to begin with could be misleading. Claims conveyed through statements that a product “does not contain” a chemical or is “free of” that chemical may also fall in this category. These claims may be  misleading if the substance, such as a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC), was never associated with the particular product. For example, dishwashing liquid might be advertised as containing “no CFCs” or being “CFC-free.” However, if dishwashing liquid products never contained CFCs, the implication that the product has been improved through removal of CFCs may be deceptive. At the same time, there  are circumstances where such a claim would be helpful to consumers, for example, if consumers might believe CFCs were an ingredient because it is common in the product category, or the marketer is responding to misperceptions in the marketplace  about the whether certain ingredients identified as substances of concern might be used or present. The issue of “relevance” must be considered in the context of the totality of the claim and developments in the marketplace, and the net impression from the totality of the claims by the marketer.  The fact that a product or service is exclusively available online does not automatically mean that it is better for the environment; any such claim must be supported by reliable scientific evidence. |

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| **Article 9: Use of technical/scientific data and terminology**  Marketing communications should not:   * misuse technical data, e.g., research results or quotations from technical and scientific publications; * present statistics in such a way as to exaggerate the validity of a product claim; or * use scientific terminology or vocabulary in such a way as to falsely suggest that a product claim has scientific validity, or misuse any label, symbol, logo, or seal to that effect. | **Article D2.2: Honest and truthful presentation; Vague or general, non-specific claims**  Vague or general, non-specific claims of environmental benefit may convey a range of meanings to consumers. Such claims should be made only if they are valid, without qualification, in all reasonably foreseeable circumstances. Claims such as “environmentally friendly” or “ecologically safe”, implying that a product or an activity has no impact—or only a positive impact—on the environment, should  not be used without qualification unless a very high standard of proof is available.  Qualifications should be clear, prominent and readily understandable to a typical consumer; the qualification should appear in close proximity to the claim being qualified, to ensure they are read together.  **Article D3: Scientific research**  An environmental claim relating to health, safety or any other benefit should be made only where it is supported by reliable scientific evidence. | All environmental benefit information and claims should be supported by reliable scientific evidence. Many tests exist to evaluate specific aspects of a product’s impact on the environment, such as its ability to degrade or be composted under specific conditions. Local laws and regulations may require use of specific test methods.  Scientific terminology should be used in a way that can be readily understood by those to whom the message is directed. Technical demonstrations and visuals (including dramatizations) must be based on relevant scientific data, common use patterns, and should be qualified as needed to avoid any misleading implication.  A specific claim about individual environmental attributes supported by reliable evidence could be linked to a claim of “sustainability” (for example, “our products are sustainable because they are made of 100% post-consumer recycled content and are recyclable”); however, marketers should avoid stating  or implying that a product is “sustainable” without qualification simply because it has some positive environmental benefits.  If a marketer states or implies that a product has minimal negative environmental impact throughout its life cycle (for example, “from cradle to grave, the most eco-friendly product on the market”), the claim expressly states that it is supported by a full LCA, and the marketer should disclose the standard that was relied on to make the claim. Similarly, a general cliam such as “the most eco-friendly product on the market” implies that it is supported by a full LCA. Other claims, such as claims regarding carbon emissions associated with production and transport to business customers, may be supported by a more limited “cradle to gate” LCA.  Not all environmental claims must be supported by an LCA. If a marketer makes a sustainability claim based on a single attribute, an LCA is not required, but the marketer must link the general claim, such as “sustainably produced,” to the relevant, appropriately substantiated claim about that single attribute. For example, “sustainably produced” associated with a disclaimer that production “uses 40% less water” than the marketer’s prior version of the product should be substantiated by appropriate evidence related to the water efficiencies achieved. The marketer must bear in mind that by also making a general claim, it should not overstate the environmental benefits of a product in a misleading way. |

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|  |  | Tests and statistics used to support environmental claims should relate to conditions likely to be experienced by the consumer to assure the test results provide a reliable scientific basis to substantiate the specific advertising claim. Further, tests should be conducted on the actual product (or one that is substantially identical) to assure the results are applicable to the product for which the claim is made. For example, tests on  raw materials (e.g., compostability tests of a plastic resin) may not be fully representative of the performance of finished products (e.g., compostability of a plastic container made of that resin); if they are not, the tests may not provide adequate substantiation for the claim.  Marketers should specify whether an environmental claim applies to a product, to part of the product or to its packaging if the context is not otherwise clear. In some cases, whether the claim applies  to a product, or its packaging will be apparent. For example, a claim that a milk carton is “recyclable” self-evidently applies to the carton and not the milk as no typical consumer would think that the claim applies to the milk. In contrast, a “recyclable” claim for a paperboard cereal carton with a wax paper inner liner should clarify if the claim applies to the paperboard carton, the inner liner, or both.  Even apparently simple environmental claims may require qualification or explanation. For example, when a product is labelled as “recyclable,” or the common symbol, the Mobius loop, appears on the product or package, a consumer may not understand whether the package, the product itself, or both are recyclable. Also, the consumer may not understand whether the product or package is merely capable of being recycled or can actually be recycled in the local community. |

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|  |  | Since the Mobius loop may also indicate recycled content, further disclosures are needed if the product or package is recyclable but does not contain recycled content. Adding an appropriate qualifier (such as adding “85% recycled content” in close proximity to the Mobius loop) should appropriately convey that the claim involves recycled content rather than recyclability. Marketers should consider whether qualifiers should be integrated into the advertisement to ensure that the claim is clear to the consumer.  Consumers are now familiar with using the Internet to locate information and have widespread access to online resources. There may be circumstances where it is appropriate to refer a consumer to a website where accurate additional information may be obtained as an adjunct to an appropriate qualifier. An example might be: “Recyclable in some communities. Visit [insert URL] for information on available facilities.” In this case, the actual  qualifier (recyclable in some communities) conveying the rather limited nature of recycling should be placed in close proximity to the claim, but a link to where consumers can find additional  information is not part of the needed qualifier. Instead, it provides a way for consumers to obtain additional useful information.  Particularly where the claim relates to end of life disposal, the consumer will often have the ability to take appropriate action by checking online when the product is ready to be discarded and providing such information could encourage consumers to actually check on recycling or composting options in local areas.  Claims that a product, package or component is “free” of a chemical or substance often are intended as an express or implied health or safety claim, for example. |

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|  |  | Such claims occur even where there is a debate in the scientific literature, and conclusive information about safety is not available. Such claims may legitimately respond to consumer concerns about the chemical. The substantiation necessary to support an express or implied health or safety claim about the absence of a chemical or other substance may be different from the substantiation required to support the environmental benefit claim. The marketer must be sure to have reliable scientific evidence to support an express or implied health and safety claim.  For example, a claim that a product is “free of phthalates” is supported by evidence that the product contains no intentionally added phthalates and that levels present are no more than a trace or background level. Likewise, marketers should use care if an alternative substance with potential safety or health effects has been substituted. However, if the claim includes an express safety claim, such as “Safe!” or “Safe, Phthalate-free,” or conveys a broader implied claim by associating the “free of” claim with  a health benefit or safety claim, additional evidence may be needed to support any express or implied claim about safety. Such claims could be implied comparative claims that products containing phthalates are “unsafe” or that the phthalate-free product is safe despite possible risks of substitute substances. The elimination of a specific substance does not automatically substantiate a claim that it is “safer” than a product that includes the referenced substance. |

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| **Article 6: Substantiation**  Marketers should have a reasonable basis for making claims claims relating to verifiable facts at the time the claim is made. Claims that state or imply that a particular level or type of substantiation exists should have at least the level of substantiation advertising. Supporting documentation should be provided promptly upon request to the self-regulatory organisations responsible for the implementation of the Code. The standard of proof required generally depends on factors such as the type of claim, the product, the consequences of a false claim, and the benefits of a truthful claim.  Substantiation should be based on documentation, tests or other factural evidence that is valid, reliable and sufficiently precise to support the claim made. In the absence of required substantiation, the claim would be regarded as misleading. | **Article D1: Substantiation**  All express or implied environmental claims should be substantated by reliable scientific evidence. (Reliable scientific evidence is the type of evidence likely to be recognized by experts in the field. Such evidence may, depending on the claim, consist of tests, analyses, caluclations, studies, reports, surveys or other information.) Care should be taken to assure that the substantiating data relied upon reflects the relevant product or activity and the claimed environmental aspects, attributes or performance featured in the marketing communication.  To substantiate aspirational claims or claims expressing goals or commitments related to achieving certain environmental metrics in the future, a marketer should be able to demonstrate that it has reasonable plans in place to work in good faith towards achieving the stated aspiration, goal or commitment in the timeframe specified.  As described in Article 6 fo the Code, marketers need to monitor and review environmental claims regularly to ensure ongoing compliance, accuracy, and relevance. Typically, reliable scientific evidence, such as test data, analyses, studies and other documentation are required to meet this standard.  **Article D2: Scientific research**  Marketing communications should use technical demonstrations or scientific findings about environmental impact only when they are backed by reliable scientific evidence. | Marketers must be able to support claims at the time the claim is made, including aspirational claims, but are not required to include supporting information in marketing communications. However, if they do, the additional information provided must be truthful and not misleading. Test methods and statistical models may be appropriate; however, they must be relevant to the particular attribute and product  conditions of use, and to the particular environmental impact that the marketer is measuring. |
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| **ICC Principles**  General Provisions on Advertising and Marketing Communication Practice | **ICC Principles**  Chapter D—Environmental Claims in Marketing Communications | **Other Considerations**  in Environmental Marketing Communications |
| **Article 14: Comparisons**  Marketing communication containing comparisons should be carefully designed so as not to mislead and should comply with the principles of fair competition. Points of comparison should be based on verifiable facts. Product or price advantages that are demonstrable per se should not be exaggerated or overdramatised. Comparisons should be clear whether they are to a competitor’s product or to another version of the same product. | **Article D4: Comparisons**  Any environmental claim should be specific and the basis for the comparison should be clear and understandable to reasonable consumers.  Environmental superiority over competitors should be claimed only when an advantage can be demonstrated. Products being compared should meet the same needs and be intended for the same purpose. |  |
|  | Comparative claims, whether the comparison is with the marketer’s own previous process or product or with those of a competitor, should be worded in such a way as to make it clear whether the advantage being claimed is absolute or relative and whether it relates to the overall benefit or a specific benefit. | Claims that a product “does not contain” a chemical or is “free” of that chemical are often used to establish a comparison between different versions of the same product, or to establish a comparison with a competitor’s products. Such claims can be misleading if in fact the product does contain the chemical or, even if it does not, contains a similar chemical with a similar impact, or an alternative with another significant environmental impact. If there is a direct comparative claim, the claim should make clear whether the comparison is to a competitor’s product or to another version of the same product. Likewise, it should make clear whether obtaining the benefit requires specific action by the consumer. |
|  | **Article D5: Product life cycle**  Environmental claims should not be presented in such a way as to imply that they relate to more stages of a product’s life cycle, or to more of its properties, than is justified by the evidence; it should be clear to which stage or which property a claim refers. A life-cycle benefits claim should be substantiated by a full life-cycle analysis (cradle to grave). If an alternative lifecycle analysis is used (e.g. cradle to gate), the more limited scope of that life-cycle analysis should be disclosed. | Nothing in the ICC Code or this Framework is intended to suggest that a full or partial LCA is required to support all environmental claims. Many marketers properly focus on a single element of a product’s life cycle deemed to have the most significant environmental impact. For example, for appliances, energy and/or water consumption during use typically represents the most significant environmental burden. The relevant aspect of the product’s life cycle to be considered will depend on the claim. The reliable scientific evidence required to support |

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| **ICC Principles**  General Provisions on Advertising and Marketing Communication Practice | **ICC Principles**  Chapter D—Environmental Claims in Marketing Communications | **Other Considerations**  in Environmental Marketing Communications |
|  | When a claim refers to the reduction of components or elements having an  environmental impact, it should be clear what has been reduced. Such claims are justified only if they relate to alternative processes, components or elements which result in a significant environmental improvement, taking all relevant aspects of the product’s  life cycle into account.  Claims that a product does not contain a particular ingredient or component, e.g., that the product is “X-free”, should be used only when the level of the specified substance does not exceed that of an acknowledged trace contaminant or background level. | a single attribute claim should relate to the environmental impact of the claimed attribute in the relevant portion of the life cycle. If, however, the marketer states or implies that the claimed attribute results in a broader environmental benefit, additional evidence, such as an LCA, may be required. When using an LCA, companies should not make claims that may be misleading from a life cycle perspective.  A CFC-free claim may be misleading if it implies that the product has no impact on stratospheric ozone, or no impact (or only a positive impact) on air quality. A “free of” claim may also be misleading if it implies to the typical consumer that the compared product is unsafe, toxic or harmful when it is not. For example, advertising a product as superior to a competitor’s  product because it is “CFC-free” may be misleading if the product or class of products had never contained CFCs or contains  other chemicals that may also have an impact on depletion of stratospheric ozone.  Some regulators have indicated that trace or background levels of a substance may be present in products advertised as “free of” that substance given chemical measurement challenges.  Determining what level is “trace” or “background” in particular circumstances may be difficult; reference to levels regulated by environmental or health and safety laws, laboratory methods and detection limits, or other standards, may be appropriate. In some regions, the concept is expressed as “de minimis” rather than trace or background, reflecting a level not likely to involve environmental or other potential harmful exposure. If the substance is not added intentionally during manufacturing of the product to which the claim attaches, and manufacturing operations limit the |

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| **ICC Principles**  General Provisions on Advertising and Marketing Communication Practice | **ICC Principles**  Chapter D—Environmental Claims in Marketing Communications | **Other Considerations**  in Environmental Marketing Communications |
|  | **Article D8: Environmental attribute claims**  Environmental claims referring to a product’s makeup or constituents (for example, made with recycled or renewable content or waste handling (for example, recyclable or compostable) should truthfully represent the attributes of the advertised product based on reliable scientific evidence as set out in Article D1. A product claimed to involve recycled or renewable content that is made from less than substantially alla recycled or renewable content should avoid any risk of misleading consumers, e.g. by disclosing the percentage. A product claimed to be recyclable or compostable should disclose the extent of availability of these disposal methods if availability is limited. | potential for cross-contamination, a claim such as “no intentionally added xx” may be appropriate. However, if achieving the claimed reduction results in an increase in other harmful materials, the claim may be misleading.  Marketers should disclose limitations on availability of recommended waste disposal options, such as recycling or composting. For products that are compostable only in commercial or industrial facilities, it is important to disclose that the product is commercially compostable only. Likewise, products that meet standards for home compostability may not meet applicable requirements for commercial compostability.  Where the claimed disposal method is subject to significant limitations, then qualifiers identifying those limits may need to be more robust. Marketers may advise consumers to check for local codes or guidance on the required level of availability, as it may be different in different jurisdictions,  but such a statement does not necessarily substitute for an appropriate qualifier on limitations. For example, a qualifier for a recyclable claim might be: “Available recycling facilities may not be available in your area. Check locally.” A qualifier for an industrial compostable claim might be: “Available commercial composting facilities may not be available in your area. Check locally. Not home compostable.” |

# **Part 2** Selected environmental claims

**Part 2** of the Environmental Framework addresses a selection of specific environmental claims that have entered the marketplace, not all of which are specifically covered in the ICC Code. Suggested definitions are set forth in column 1, and application of ICC Principles and other considerations offering added guidance are set forth in column 2.

**Chapter D** for many years included detailed guidance on use of some common environmental claims. Specific claims discussed in Chapter D have always been illustrative, not exhaustive, but the Framework provides additional guidance on terms covered in Chapter D, and from time to time addresses new or additional claims. Principles provided in the Code and in Chapter D should be considered and applied as to all environmental claims, whether or not such claim is specifically addressed in the Code or this Framework. The purpose of the Code and this 2025 Framework Guidance is to offer guidance on how to assure that environmental claims are truthful and not misleading. It is not the purpose of the ICC Code to seek to establish or advance environmental policy.

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Bio-based**  Claims that a product is “bio-based” are increasing in the market. Some jurisdictions recognise that biobased materials can support new agricultural markets and reduce the need for fossil fuel, and have offered programs to recognize such content (e.g. U.S. Department of Agriculture Bio-based program). | **General**  The principal marketing consideration in making a bio-based claim is assuring that consumers understand the source of the bio-based material, and to clarify the limits of any benefit. For example, bio-based materials may be renewable, but may not recyclable or compostable. If the inclusion of bio-based content affects end of life disposal or other key environmental performance indicators, that should be clear. Use of bio-based content can reduce reliance on fossil fuel raw materials and offer carbon reduction benefits. |
| **Carbon Footprint, Carbon Offset, Carbon Neutral; Carbon Negative;**  **Net Zero; Climate Positive**  “Carbon” is a characteristic of greenhouse gas emissions. While carbon dioxide (CO2) is by far the main greenhouse gas (GHG) contributing to climate change, other greenhouse gases (e.g., methane, nitrous oxide, and a variety of fluorinated  gases (generally (CFCs, HCFCs; hydrofluorocarbons (HFCs), perfluorocarbons (PFCs); sulphur hexafluoride (SF6) and halons)) are widely recognised to also contribute to global temperature increase. The impact on the climate of GHG emissions in total may be measured as CO2 equivalents. All human activity will potentially involve the release of greenhouse gases that drive global temperature increase.  A “carbon footprint” is a way of reporting the impact on climate change from a product, service, or company’s business operations. a full assessment would evaluate all aspects, from raw material extraction and processing to actual use and product end-of-life (commonly known as “cradle to grave”), of all GHG gases. | **General**  Claims about the benefits of carbon dioxide or GHG reduction actions should clearly  specify whether the claim involves actions to reduce CO2 emissions only or all GHGs and, if the claim applies to only portions of the product’s life cycle, which portions. Marketers must substantiate all claims of the measures taken to limit, reduce or offset CO2 or CO2 equivalent contributions using a reliable scientific method. Qualifiers may be required to avoid consumer misconception that a carbon reduction or other carbon related claim implies a broader benefit to the environment or to climate goals  than is supported by the applicable scientific evidence. Providing access to the actual substantiating information may increase confidence in the validity of such claims.  Marketers must substantiate all claims of the measures taken to limit, reduce or offset CO2 or CO2 equivalent contributions using a reliable scientific method.  **Company/product/service claims**  Marketers should specify if a claim relates to a product, component, package, service or company’s business processes or operations. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| Claims related to carbon emissions, carbon neutral claims, as well as carbon negative, net zero, and climate positive, may be aspirational claims related to goals of reducing or neutralising climate impact of producing a product, service or a company’s business operations over time. Claims may reflect steps taken or to be taken through emissions reduction or compensation measures (carbon offsets).  Carbon reduction or carbon neutral claims that rely on offsets should be reviewed carefully. Offsets generally relate to reductions from other actions designed to capture carbon, like tree planting, methane capture and other actions, which may often take place outside the actual operations of the business or the location of operation. “Offsets” or credits may be purchased in the marketplace and traded to individuals or businesses in an effort to reduce the “carbon footprint.” Because climate change is a global phenomenon, any legitimate and appropriately supported action to reduce carbon contributions is an appropriate subject of a properly qualified advertising claim. | **Aspirational claims/commitments**  Communications that reflect specific environmental commitments or expressions of climate (or sustainability) goals that are aspirational in nature and not likely to be met until many years in the future, (e.g., net zero, carbon negative, climate positive, etc), require that the company is able to demonstrate, in concrete terms, that it has a reasonable capacity and methodological approach to meet such a commitment, including the permanence of carbon removals. Information about when advertised carbon-related benefits are likely to be realised may be important to consumers.  Consequently, information on when the carbon reductions or offsets are likely to occur should be disclosed.  As with all claims, the marketer should have reliable scientific evidence to support any carbon-related claim, recognising that the science continues to evolve. Qualifiers should be included if offsets will occur in the future. Claims should be based on reliable scientific evidence of a sort likely to be accepted by experts qualified by education, training and experience in the field.  **Applicable local laws**  Some jurisdictions may restrict carbon or climate benefit claims achieved through use of offsets. Likewise, carbon, climate or other environmental benefits or reduction in impacts may be required by olaw.As outlined in the ICC Code, marketers should make sure their marketing communications activities observe applicable laws and regulations in the market in which the claim is directed and should avoid any claims, whether involving climate actions or claims involving other environmental attributes, not permitted by law, or claims suggesting that its products or actions are unique when the actions or attributes are otherwise required by law.  **Carbon or climate claims**  Carbon neutral claims are understood to mean that the net carbon footprint is zero, but in many cases, zero carbon contributions, neutral carbon, carbon negative or climate positive benefits can still only be achieved using offsets, removals or credits. The science of calculating carbon or overall climate impacts associated with emissions of all GHGs continues to evolve. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | Consequently, the ICC Code recommends that marketers making carbon or climate claims, including advertising commitments that they expect to achieve or will be realised in the future, should be clear and include qualifiers as needed regarding  the method, basis and time frame relied upon for such commitments to be realised. Claims should use the same time scales for emissions, emissions reductions, and, if applicable, offsets.  Additional qualifiers may be needed to achieve the required level of transparency and clarity of the claim required by the Code and to avoid consumer misperception that a product, component, package, service or company’s business operation poses no adverse impact on the environment or is based on a full LCA of all GHG emissions if that is not the case. Steps taken through emissions reduction or compensation measures should be clearly distinguished. Marketers should rely on generally accepted definitions of these concepts, where available, and include qualifiers to clarify the meaning to consumers. Marketers should use care in adopting climate-related terms such as carbon neutral, climate neutral and net zero, as each may be defined somewhat differently and/or require different substantiating data. |
| **Circular; Circularity; Circular Economy**  The concept of “circularity” or a “circular economy” is based on reducing waste through actions such as sharing, leasing, reuse, repair, refurbishment and recycling to improve management of resources, reduce waste, and reduce climate impacts. Definitions of the concept of the circular economy continue to evolve. | A variety of non-governmental and governmental organisations are evaluating definitions of circularity and what steps are necessary to achieve it. At present there is no global agreement on standards to apply in connection with claims that products or processes are “circular”. Any claims of circularity should be based on an appropriate assessment and marketers should make clear what  is meant by the claim and disclose the basis for the claim. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Compostable**  Characteristic of a product or packaging that allow it to break down into or otherwise become part of usable compost in an appropriate composting facility or device. | Marketers should have reliable evidence that all the materials in the product or package will break down into or otherwise become part of usable compost (e.g., humus, mulch or other soil-conditioning material) in an appropriate composting facility or device. If this will occur only in facilities other than home composting facilities, this fact should be clearly disclosed, along with limitations on the availability of such facilities. To avoid consumer misunderstanding, disclosures that commercially compostable materials cannot be composted at home, or that home compostable items are not suitable for commercial composting, may be needed.  Consideration should be given to the timeframe in which materials are expected to compost. Products or packaging advertised as compostable should turn into usable compost in a timeframe consistent with other materials composted under the same conditions. This claim should not be made  if the compost, composting system or environment is negatively affected to an appreciable extent by the materials in the product or package. Similar to guidance on “free of” claims, marketers should confirm that as the product or package breaks down, it does not release substances that negatively affect the ability to form usable compost. Reference to the specific test method used is not generally required but may be useful. Jurisdiction-specific test methods or standards may be required to evaluate compostability and certifications may be required under local law. |
| **Degradable (including Biodegradable, Marine Degradable, Oxo-biodegradable, Photodegradable, etc.)**  A characteristic of a product or packaging that, in specific conditions, allows it to break down into elements known to nature within a given time. The claim should not be made for a product or packaging, or any component, which releases substances in concentrations harmful to the environment. Specific claims about  degradability, such a “biodegradable”, “marine degradable”, “oxobiodegradable” and “photodegradable”, are all degradability claims. | Degradable claims are strictly limited in some regions, particularly for plastics products and packaging, and may require use of jurisdiction-specific test methods.  A general degradability claim, where permitted, should not be made unless the marketer has reliable evidence that the product or packaging will degrade in all potential disposal environments.  Products or packaging may be shown to degrade only in a specific environment (e.g., soil, marine, or certain landfill environments). Qualifiers should describe the specific environment in which degradation occurs, and clarify environments where the product or packaging will not degrade (e.g. sanitary landfill). Products or packaging may go through different phases in the degradation process as they break down, but to support any type of degradability claim, marketers should have a reasonable basis, supported by reliable scientific evidence, to conclude that the product or packaging will ultimately entirely return to elements known in nature. Because degradation may occur over a lengthy period of time, qualifiers should disclose the maximum level of degradation a product or package achieves in testing, the test duration, and relevance of the test results to the likely circumstances of disposal. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | Generally, it is difficult to establish that a product or package will degrade in sanitary landfill, as these environments are not generally conducive to degradation. Since sanitary landfill remains one of the most common disposal methods, attention must be given to typical consumer expectations about the meaning of  any type of degradable claim. In some instances, a product, package or component may meet relevant test methods for “degradability” when improperly disposed  of rather than in a customary disposal setting. Recognising that “fugitive” waste may adversely affect the environment, identifying this feature may offer a benefit. Degradability claims should not be so framed as to incite or condone littering.  Marketers may wish to encourage consumers to dispose of the product or package responsibly, by, for example affirmatively including a statement such as “Please dispose of responsibly” or “Do not litter.” Marketers should also establish that the degradability attributes will not be harmful in customary disposal conditions, such as sanitary landfill, or compromise recycling streams. |
| **Designed for disassembly**  A characteristic of a product’s design enabling and simplifying the process of taking an assembled product apart to recover constituent components, parts and/or materials at high quality level during or at the end of its useful life in a way that allows product/ material reutilisation via end-of-life options such as reuse, repair, refurbishing, remanufacturing or recycling. | With the growth of “right to repair” laws – despite some potential product safety concerns that “do it yourself” repairs could create product hazards – more jurisdictions are adopting such laws. This, in addition to new requirements for recycling and reuse, have lead companies to offer more products that are designed for disassembly. Where appropriate, a claim of “designed for disassembly” should be accompanied by a statement explaining which components are involved and also specifying by whom disassembly is to be carried out (e.g., by the consumer or by a specialist), and potential actions (such as damaging lithium ion batteries) that should be avoided to prevent product safety hazards.  A desigined for disassembly claim may need to be qualified with regard to, for example, the availability of the process in question and any tools or equipment required. Consumer information on the disassembly method, etc. should be provided where appropriate and according to disassembly need. Claims about the ability to reclaim or reuse specific components should be treated similarly. |
| **Extended life product/ prolonged product life**  A product designed to provide prolonged use, based on improved durability and appropriate material choice, the presence of a feature enabling it to be upgraded, maintained, or repaired and resulting in reduced resource use or reduced waste. | Some products are intended for prolonged use (such as an appliance). A claim of extended life dependent on upgrades should be accompanied by an explanation of the need to upgrade or take other actions (such as routine service or maintenance) to extend durability. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | Some extended life claims may comparative by nature. Such claims should meet relevant ICC Code requirements governing comparative claims. The comparative nature of many prolonged use  or extended life claims requires qualification as to whether the comparison is to a competitor’s product, an earlier version of the marketer’s product, the replacement of other products or materials that perform the same function, etc. |
| **“Free of”, Non-toxic”, “No”, “Does Not Contain”**  The absence of a chemical or substance from a product, component, or package and/or a reference to its safety from an environmental, pet or human health standpoint. To the extent the elimination of a substance requires use of a substitute, it may be necessary to disclose the use and environmental impact of the substitute. | A marketer may always substantiate a “free of,” “no” or “does not contain” claim by establishing that the product, component or package is not used to manufacture the product, but given the existence in nature of many substances (e.g., lead, cadmium or other heavy metals), such claims must often be substantiated by  a sound scientific basis that the product, component or package contains a *de minimis* or trace amount of the substance and that the claimed substance was not intentionally added. However, a claim that the product, component, or package  is “totally free of” or contains “zero” X may connote to the typical consumer that it is completely free of the substance and may be supported by evidence that the presence of the substance is non-detectable based on established testing methodologies.  Meeting established limits set by regulation does not necessarily support a “free of” or “non-toxic” claim. It may be deceptive to make a “free of” or “does not contain” claim if a product contains another substance that may be harmful to human or animal health or the environment (sometimes termed a “regrettable substitution”). Traditionally, claims that a product is “free of” a substance (such as CFCs) should generally not be made if the substance was never associated with that product or product category or if a substitute has the same or a similar impact, even if at a lower level. For example, substituting an HCFC for a CFC generally resulted in a lower impact on stratospheric ozone, but still requires a disclosure that HCFCs do have an impact on stratospheric ozone.  A marketer should be able to substantiate all environmental or health claims implied from a “free of” and similar claim. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | “Not made with fossil fuels” or fossil fuel reduction claims are emerging as consumers show more concern about global warming. The marketer should have reliable evidence to support such claims.  “Microplastic-free” claims have also begun to emerge in the marketplace. At present, the regulatory framework to define microplastics remains in flux and scientific studies continue. To the extent this claim appears to imply that a product is fully degradable in some or all environments, the marketer should have reliable evidence that the product meets standards for degradability in the relevant disposal environment (e.g., returning entirely to elements known in nature). To the extent a claim appears to imply that a product does not contain microplastics or does not break down into microplastics after customary use or disposal, or after disposal in a specific environment, the marketer should have reliable evidence supporting that statement, considering the intricacies of polymer and polymer chemistry and evolving definitions of materials considered to be “plastics.” |
| **Recovered energy**  A characteristic of a product made using energy recovered from material, or energies which would otherwise have been disposed of as waste but has been collected through managed processes. In this context, the recovered energy may itself constitute the product. | Recovered energy claims may be difficult for consumers and even sophisticated business customers to understand. It is important that the scientific basis for  the claim is clear and transparent. Marketers making recovered energy claims should take steps to manage adverse effects on the environment resulting from the collection and conversion of waste into energy. Where appropriate, a claim of recovered energy should be accompanied by details of the type and quantity of  waste used for recovery. Materials diverted from the waste stream for energy or fuel recovery should generally not be characterised as “recyclable,” but waste diversion claims may be made with appropriate qualification and substantiation. |
| **Recyclable**  A characteristic of a product, component or packaging enabling it to be diverted from the waste stream through available processes and programmes, and to be collected, processed and returned to use in the form of raw materials or products. Symbols, like the Mobius Loop, which consists of three twisted chasing arrows forming a triangle, standing alone may constitute both a recyclability and a recycled content claim. | To support a recyclable claim, the marketer should have reliable evidence that the product, component or packaging can be diverted from the solid waste stream and actually made into another useful product. There is no requirement that a recyclable product must be made into another product of the same type (for example, plastic soda bottle to plastic soda bottle) to support a recyclable claim; it simply needs to be made into another useful product (for example, plastic soda bottles are recycled and used to make garments). |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | Marketers should conduct due diligence to confirm that a product can be recycled in the markets where the product is distributed, and determine the relevant acceptance rates, as the relative availability of recycling facilities to consumers  or communities and actual recovery and reprocessing of the item implicates the types of qualifiers that may be needed. The ultimate end user must be able to return the product for further processing, through community or curb side recycling  programmes, drop-off programmes, “take-back” programmes, or other mechanisms, and products advertised as recyclable must actually have a reasonable likelihood that they can be processed into another useful product. Recyclable claims must be qualified to the extent necessary to disclose limits on the availability of recycling facilities or ability to process recovered materials. A product that is refillable or reusable, or that contains or is made with recycled content, is not necessarily recyclable.  An unqualified claim of “recyclability” includes the terms “recyclable,” “100% recyclable,” and “please recycle.” “Recyclable where facilities exist” is also viewed as an unqualified claim of recyclability under most guidance and requires further disclosures regarding the availability of collection facilities where they are limited.  Some areas (e.g., the U.S.) apply a “substantial majority” test, using a 60% of consumers or community standard to support an unqualified recyclable claim; others use a “reasonable proportion” standard. A qualifier about the extent  of available facilities is needed if the product, packaging or component is not recyclable to a “substantial majority” or “reasonable proportion” of consumers or communities, as applicable. Marketers could state “Not widely recycled—check locally” or “Recycling facilities are limited—check locally” where a product is not widely recycled.  Recyclable claims for a product, packaging or component can be based on a “take-back” process where the producer or manufacturer of the consumer product  can accept the material back for recycling into the same or another useful product. Claims that a product or package is recyclable through a take-back programme should clearly specify the product, packaging or component that is recyclable, the steps the consumer needs to take to return it to the producer or manufacturer, and limitations on availability. |

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|  | For example, batteries that are recyclable through participating national retailers could claim “Recyclable. Drop off at participating national retailers, including [list major partners].”  Claims should clearly specify whether the product, packaging or component is recyclable, contains recycled content, or both.  Marketers making recyclability claims who use the Mobius Loop should remember that it is a symbol for both recycling and for recycled content.  The Mobius Loop should not be confused with material identification code markings, including the Resin Identification Code (RIC) marking that identifies a specific type of plastic that may be permitted or required in some jurisdictions. Plastic bottles and rigid plastic containers meeting certain size parameters (generally a capacity of eight ounces to five gallons) must be marked with the RIC in some jurisdictions. The RIC consists of an acronym for a specific type of plastic with an associated number from 1–7 (1–6 for the major plastic packaging resins, and then a seventh category  for “7 – OTHER” resins) and may include a triangle design with arrows. The Mobius loop has a chasing arrow design where the arrows are flipped over and are relatively thick; the RIC features a simple triangle of arrows around a number from 1–7. The images below provide an example of the RIC (as embodied in most U.S. state laws), and an example of the Mobius loop. One applicable standard adopts a solid triangle design instead of the arrow design for the RIC, which  is also shown below.  Even though it is not the same as the Mobius loop, the conspicuous use of the RIC marking—such as on the front label, in close proximity to the product name and logo—could be interpreted to convey a recyclable claim. However, inconspicuous use of the RIC alone does not generally constitute a claim of recyclability. Laws regarding use of these symbols may abe evolving, so careful attention to local law is needed. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
|  | No claim of recyclability should be made, including through prominent depiction of the RIC or association of the RIC with a recyclable claim, unless appropriate substantiating data exists and, as needed appropriate qualifiers are provided.  If there is any likelihood of confusion about what the Mobius loop conveys (e.g., recyclable, recycled content or both), the precise meaning of the symbol should be clarified by an explanatory statement, e.g., the words “recyclable” (with appropriate qualifiers) or “x% recycled content.” If there is any likelihood of confusion about whether the symbol relates to the product or the packaging, it should be accompanied by an appropriate qualifier. |
| **Recycled Content, Recycled Material and Recovered Material**  These three claims are closely related.  **a) Recycled content**  The proportion, by mass or weight, of recycled material recovered and used in a product or packaging. Only pre-consumer and post-consumer materials are  considered as recycled content. Pre-consumer material means material diverted from the waste stream during a manufacturing process and not reclaimed as part of that same process. Post-consumer material means material generated by households or other end-users (including business users) which can no longer be used for its original purpose. Regrinding, reusing, and reprocessing waste or scrap within the same process does not generally qualify as pre-consumer material, but takeback of scrap from downstream users does.  While recycled content claims have typically been based on the recovery of physical waste and processing of that waste into another physical product, chemical recycling is an emerging technology that is increasingly recognised. Recovery of materials from the waste stream and reprocessing them to make new useful products (excluding energy or fuels) may support a recycled content claim on downstream products made with chemically recovered material. | An unqualified claim of recycled content should not be made unless all, but an insignificant amount of the product or package is made of recycled content; otherwise, a percentage qualifier by weight is needed. As indicated above, the Mobius Loop may be viewed to constitute both a claim of recyclability and a recycled content claim and should be accompanied by an appropriate qualifier as necessary. Claims that a product contains “up to” a specified percentage of recycled content may be deceptive depending on the amount involved; claims specifying the minimum amount of recycled content the product or package contains are often preferred.  With advanced recycling (sometimes called molecular or chemical recycling), waste products are diverted from the waste stream, recovered and returned to a molecular state for further processing into other useful products. Much as electricity derived  or generated from renewable energy sources is indistinguishable from electricity derived from conventional sources once it is introduced into the electrical power grid, materials that undergo chemical recycling are indistinguishable from virgin materials. However, by diverting waste, chemical recycling reduces waste and the resulting material qualifies as “recycled content” in the same way that traditional physical waste products do. Measuring the mass of recycled material used to support a recycled content claim, including claims based on advanced or chemical recycling technologies, can be accomplished in many different ways. Use of an annual weighted average is generally an acceptable approach to substantiating claims for many products made with physically recycled materials. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| 1. **Recycled material**   Material that has been reprocessed from recovered (reclaimed) material by means of a manufacturing process and made into a final product, material  or into a component for incorporation into or attribution to a product.   1. **Recovered (reclaimed) material**   Material that would otherwise have been disposed of as waste or used for energy recovery but has instead been collected and recovered (reclaimed) as material input, in lieu of new primary material, for a recycling or manufacturing process. | More complex mass balance calculations may be needed to support claims where recycled content is developed using technologies, such as molecular recycling,  to account for yields and losses as the material is reprocessed and to allocate or attribute the recycled material to the production of a specific product.  For example, claims that a product is made with recycled content based on molecular recycling could be supported by evidence that 1) the waste materials used were diverted from the waste stream, 2) the waste materials were reprocessed to a molecular state, and 3) the amount of material so created from the waste is allocated or attributed to the creation of new products such that double counting cannot occur. A traceable, auditable method of tracking inputs, losses, yields and uses would typically be needed to support claims of recycled content based on molecular recycling.  A material must be recovered or diverted from the waste stream or be reclaimed and used to make a product to be considered “recycled content.”  To the extent a claim includes specific reference to pre-and post-consumer content, the specific claim about the source of the recycled content (e.g., “100% recycled content; 60% post-consumer content”) must be substantiated. There may be differences between how different jurisdictions define pre- and post-consumer content. For example, ISO includes material returned from distribution chains as “post-consumer” material.  In some jurisdictions, material that is customarily put back into the manufacturing stream as an ordinary economic practice cannot be claimed as recovered or counted towards recycled content.  In some jurisdictions, and for some product categories, energy use, consumption, efficiency and savings claims are highly regulated. Product categories may include appliances, light bulbs, cars and home insulation. Marketers should adhere to local requirements governing testing, labelling and advertising of such products. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Reduced energy consumption (energy-efficient, energy-conserving, energy-saving)**  Reduction in the amount of energy consumed by a product performing the function for which it was designed when compared with the energy used by other products performing the equivalent function. Claims in this category relate to energy reduction in the use of goods and delivery of services, but not in the manufacturing process of a product or its packaging. Such claims are often comparative by nature (either related to prior ierations of the products, to standard performance requirements, or to competitor’s products), and should fulfil the appropriate requirements. | Energy savings claims are among the claims most important to consumer when they purchase energy-consuming products, such as appliances, air conditioning units, and more. Many jurisdictions have adopted standards that apply to certain categories of products, and programs to recognize higher-performning products, like the US Environmental Protecion Agency’s (EPA) Energy Star program, have attained global recognition. Marketers should be especially careful to comply with applicable laws and, regardless of whether legal requirements apply, to appropriately frame claims about energy efficiency, energy conservation and energy savings to avoid misleading consumers. |
| **Reduced resource use**  A reduction in the amount of material, energy or water used to produce or distribute a product or its packaging or specified associated components. This claim is comparative by nature and should fulfil the appropriate requirements. | Marketers may reduce the use of certain resources in many different ways. For example, a food company could reduce the use of water during food processing by new equipment or processing procedures or could reduce the weight of packaging by adopting a new design, resulting in less material that might have to go to solid waste. A claim of reduced resource use should generally be expressed in terms of percentage reduction. The percentages for product and packaging should be stated separately and not combined.  When a claim of reduced resource use is made, the type of resource concerned should be stated, and the percentage reduction should be expressed separately for each resource (e.g., water, energy, raw materials, fossil fuels, etc.). If the claimed reduction causes an increase in the consumption of another resource, the resource affected, and the percentage increase should be stated.  Vague and non-specific claims such as uses “less” raw materials, water, energy or the like, or general statements such as “source reduced,” are unlikely to provide  adequate information to a consumer based on the inherently comparative nature of the claim. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Reduced water consumption (water-efficient, water-conserving, water-saving)**  Reduction in the consumption of water associated with the use of a product performing the function for which it was designed when compared with the amount of water used by other products performing an equivalent function. Claims in this category relate to water reduction in the use of the product, but not in the manufacturing process of the product or its packaging. Such claims are comparative by nature and should fulfil the appropriate requirements. | Reduction in the amount of water used in processing may offer significant benefits and can be truthfully communicated, with appropriate qualifiers (such as  percentage reduction or savings) and clear comparisons (e.g., to earlier versions of a product or to a competitor’s product), in advertising, provided the claim can be properly substantiated. |
| **Renewable material**  A characteristic of a product or package that derives from use of biomass (material of biological origin) that comes from sources that are continually replenished at a rate equal to or greater than its depletion. | An unqualified claim of renewability should not be made unless the product or package consists of 100% renewable content, excluding minor, incidental  components. Qualifications should reference the percentage of renewable materials as compared to the total mass if this threshold is not met.  Claims that a product contains “up to” a specified percentage of renewable material may be deceptive, especially if the range of renewable material used is broad; claims that a product contains a minimum amount of renewable material are preferred. Use of an annual weighted average is generally an acceptable approach to substantiating claims.  Not every use of biomass or a biobased material constitutes use of a “renewable” material; a material is renewable if the resource is managed to assure that it will not be depleted. While crops such as corn are understood to be grown annually, and trees are understood to have a much longer growing period, reference to the  timeframe in which the product may be renewable may be appropriate if consumers may not understand the timeframe at which the resource is replenished. Note that some jurisdictions may offer government-sanctioned programmes to promote  the use of “biobased” materials; marketers should not expressly or impliedly claim they meet standards of a government program if they do not and may not use a government seal without authorisation. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Renewable energy**  Renewable energy is electricity derived from sources that are constantly replenished. Wind, solar and geothermal energy are examples, but other sources, such as biomass or hydroelectric, may also be deemed renewable. Energy derived from fossil fuels such as petroleum or coal should not be described as deriving from renewable sources. Local requirements should be consulted to identify specific sources deemed renewable. | Electricity derived or generated from renewable energy sources is indistinguishable from electricity derived from conventional sources once it is introduced into the electrical power grid. Consequently, claims about use of renewable energy or power should be substantiated through contracts with electrical utilities, renewable energy certificates (RECs) or similar mechanisms that prevent “double-counting.” No express or implied claim that a product was manufactured, or service provided with renewable energy should be made unless 100% of the energy used to produce the product or offer the service can be traced to renewable energy sources; otherwise, qualifiers should be used. Marketers may reduce the risk that consumers will be  misled as to the type of renewable energy by including that information in the claim. Unqualified claims about “hosting” a renewable energy facility may be viewed as deceptive if the energy is sold to other users. |
| **Reusable, Refillable**  Reusable and refillable claims share common features.   1. **Reusable**   A characteristic of a product or packaging conceived and designed to accomplish within its anticipated life cycle more than one application, rotation or use for the same purpose for which it was conceived.   1. **Refillable**   A characteristic of a product or packaging that can be filled with the same or a similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing. The marketer should generally also provide a means for the product to be refilled. | No product or packaging should be described as reusable or refillable unless it can be reused or refilled for the same or similar purpose. Such claims should be made only where programmes, facilities or products exist for the same purpose. If there is a limit, based on safety, quality or other reasons, on the number of times the product or package may be reused or refilled, those limits should be clearly disclosed.  Some jurisdictions have adopted strict standards for “reusability” claims, especially for food and beverage containers and food service products, to meet sanitation standards. Careful attention to local requirements is needed in structturing claims. |

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| **Selected Environmental Claims**  in Marketing Communications | **Application Of ICC Principles And Other Considerations**  in Environmental Marketing Communications |
| **Source reduction and waste reduction**  Source and waste reduction claims share common features.   1. **Source reduction**   Reduction in size, weight, volume or toxicity of a product or package. This claim is comparative by nature and should fulfil the appropriate requirements.   1. **Waste reduction**   Reduction in the quantity (mass) of material entering the waste stream as a result of a change in a product, process or packaging, but excluding the in-process re- utilisation of materials. This claim is comparative by nature and should fulfil the appropriate requirements.  Waste may include discharges to air and water as well as solid waste from processes, and waste reduction may occur at the production, distribution, use and disposal stages. Claims may be based not only on a reduction of water use or the amount of solid waste, but also on a reduction in mass through waste treatment processes. A reduction claim may also relate to the transfer of waste to other users who intend to utilise it for a constructive purpose. | Vague and non-specific claims such as uses “less” raw materials, water, energy or the like, or general statements such as “source reduced”, are unlikely to provide  adequate information to a consumer based on the inherently comparative nature of the claim. Source reduction may be measured through a weight per unit or use of the product approach, as well as physical reduction of material in, for example, packaging.  Certain new technologies, such as chemical recycling, may allow for diversion of plastic products from the waste stream to produce a variety of new, useful products. Marketers claiming that a specific amount of waste was diverted from, e.g., solid waste, or substitute for virgin or fossil fuel-based materials, should have reliable evidence supporting the amount of the waste reduction. Consistent with the general provisions of this Framework and the Code, marketers should be careful not to overstate the impact of the diversion or reduction. |

**Annex 1** Environmental claims checklist

This checklist is intended to assist marketers, communication agencies and other practitioners in identifying when they are making an environmental claim and offers guidance on questions about such claims. The checklist is designed to serve as a screening check for practitioners to help identify a number of claims and considerations in making claims. Additional guidance is provided in Part 1 and Part 2 of the Environmental Framework. Environmental claims may apply to goods (including packaging or components), as well as services, product lines, or to an organisation or facility.

### Do your proposed claims address:

* The effect of the product, component or package on solid waste?
* The effect of the product, component or package on water?
* The effect of the product, component or package on air (smog, stratospheric ozone, nitrogen oxides (NOx), sulphur oxides (SOx), etc.)?
* The effect of the product, component or package on climate (greenhouse gases, carbon offsets, carbon removal, carbon neutrality, climate positivity, etc.)?
* The effect of the product, component or package on energy usage?
* The effect of the product, component or package on wildlife and biodiversity?
* The effect of the product, component or package on human health?
* The overall effect of the product, component or package on the environment?
* The absence, reduction or presence of a specific substance?
* The “sustainability” of the product, component or package?
* Whether the product, component or package is made with or from renewable material or renewable energy?
* Whether the product, component or package contains, is made with, or derives from or can be attributed to recycled material?
* Whether the product, component or package is recyclable?
* Whether the product, component or package is compostable or biodegradable?
* Whether the product or package is reusable or refillable?
* The future environmental benefits or goals of the organisation?
* Other claims implicating the impact of your products or operations on the health of the planet, the environment or the climate?
  + You are making an environmental claim and should evaluate the net impression of the advertising to assure that it is not deceptive or misleading to the intended target audience.

### Are these benefits or effects express or implied?

* Do you make express statements such as those above?
* Do you use colours (e.g., green), pictures (e.g., trees, mountains, wildlife) or other elements to connote environmental or sustainability benefits?
  + You are making an environmental claim and should evaluate the net impression of the advertising to assure that it is not deceptive or misleading to the intended target audience.

### Are your proposed claims subject to any mandatory regulations or legislation?

* You may be subject to mandatory disclosures in advertising and labelling, or may be required to substantiate certain claims using specific standards or methods.
* Are your proposed claims specific and unambiguous? Vague and non-specific claims are likely to be misleading and should be avoided.
* Your ability to make a claim suggesting a unique benefit when actions are required by law may be limited.
* Your ability to make certain claims at all may be limited or restricted by applicable law.

### Does the claim clearly indicate if it applies to the product, the packaging, or both, or to components or materials? Does the claim indicate if it applies to the entire product line? To a facility? To the entire organisation?

* The claim should clearly identify the subject of the claim (product, facility, organisation), and what environmental attributes are involved.

### Do you have a reasonable basis for the express and implied claim(s) you are making?

**Did you have substantiating scientific data supporting the claim at the time the claim was made? Does the data reflect sound scientific principles likely to be accepted by experts qualified by education, training, and experience in the field? Is the data readily available in the event of a challenge or question? Do you have procedures to retain the substantiating information for an appropriate period related to the useful life of the product?**

* Any objective performance claim likely to be material to a consumer, such as a claim about environmental benefits of a product, package, component, service, facility or organisation, or detriments of a competitor’s product, package, component, service, facility or organisation, should be supported by relevant test data, analyses or similar information at the time the claim is made.

### Are your proposed claims verifiable based on appropriate test methods or scientific data?

* What is the test method used? Is it recognised by government agencies or reputable standards organisations? To relevant authorities specify use of only certain test methods to support the specific claim?
* Does the method accurately reflect how the product, component or package will likely be used or disposed of by the consumer in the manner reflected by the claim?
* Has the product, component, or package for which the claim is made (or one substantially identical) been tested? Is the information provided understandable to the typical consumer, avoiding confusing jargon?
  + Standards and test methods must be reasonable and appropriate, and results provided must be clearly presented. Tests should be conducted on products or samples of products for which the environmental claim is made.
  + Data should be presented in a way that does not exaggerate the validity of the product claim

### Are you making a general claim that the product, component or package is “good” for the environment based on a single attribute (e.g., “eco-safe,” “earth friendly,” “environmentally friendly,” “sustainable,” “green,” “carbon neutral” and similar claims)?

* Since environmental impacts encompass a multitude of criteria, a general claim of environmental benefit linked to a single attribute is likely to be misleading unless the relationship is specific and clear.
* Claims about the benefits of carbon or greenhouse gas reduction actions should be transparent and clearly specify whether the claim involves actions to reduce carbon dioxide or all greenhouse gases, and, if the claim applies to only portions of the product’s life cycle, which portions.

### Is the claim relevant to the intended audience?

* It may be misleading or deceptive to make a claim about an environmental benefit that suggests there is a meaningful benefit when there is not.

### Do you state or imply that the product, component, or package has unique environmental benefits?

* Environmental benefits shared by other similar products, components, or packages should not be presented in a way that suggests the benefit is unique to the marketer’s product.

### Are you making a claim based on the product life cycle? What stages of the life cycle are considered (e.g., raw material production, manufacturing, transport to market, disposal)?

* Most guidance on environmental claims does not address claims based on life cycle analysis (LCA). The results of an LCA may depend on the inputs. Marketers should ensure that the scope of an LCA adequately covers the expected environmental impacts of the product. If an LCA is used to support comparative claims, the identical inputs should be included in the comparative analysis. The products or services involved should also be of the same type or category for the comparison to be fair, and disclosures of material differences in the compared products may be required. If a more limited “cradle to gate” LCA was conducted, the scope should be clear.

### Does the claim relate to health, safety or other benefits apart from environmental benefits (this might include “free” claims as well as claims such as “safe”, “safer”, “non-toxic”, “pesticide-free” or “organic”)?

* Express or implied health claims must have a reasonable basis. To meet that standard, each claim may have to be independently substantiated with appropriate scientific research or support.

### Do you state or imply that the product, component or package was made with renewable material or energy?

* An unqualified claim of renewability should not be made unless the product or package consists of 100% renewable content, excluding minor, incidental components.
* Claims about use of renewable energy or power should be substantiated through contracts with electrical utilities, renewable energy certificates (RECs), etc.

### Do you state or imply that the product, component or package has recycled content or is recyclable?

* Is it clear which claim is made? Is the extent of the claim also clear?
  + Since the Mobius loop standing alone may indicate recyclability and recycled content, further disclosures may be needed if the product or package is recyclable but does not contain recycled content, unless applicability of the claim is clear from the context.
* If you make a recycled content claim, does the product, package, or both contain actual or attributed recycled content?
  + Marketers must be able to trace and quantify yields and losses in the recycling process to support the claimed amount of recycled content in or attributed to a product or package.
* If you make a recyclable claim, is it clear if the product, package, or both are recyclable?
  + When a product is labelled as “recyclable,” or the common symbol, the Mobius loop, appears on the product or package, a consumer may not understand whether the package, the product itself, or both are recyclable. Also, the consumer may not understand whether the product or package is merely capable of being recycled or can actually be recycled in the local community.

### Do you state or imply that the product, component or package is compostable?

* Marketers making compostable claims should have appropriate scientific evidence that all the materials in the product or package will break down into or otherwise become part of usable compost in an appropriate composting facility or device in a timeframe consistent with other materials composted under the same conditions. If the product is compostable only in certain environments, qualifiers should be included. If the product is compostable only in commercial facilities, the limited nature of those facilities should be disclosed.

**Do you state or imply that the product, component or package is degradable?**

* A general degradability claim should not be made unless the marketer has reliable evidence that the product or package will entirely break down and return to nature in all potential disposal environments. Appropriate qualifiers are needed, including, if tests do not support degradation in the environment of customary disposal, such as sanitary landfill, that the product will not degrade in such environments. Degradability claims should not be so framed as to incite or condone littering.

### Do you state or imply that the product or package is refillable or reusable?

* No product or packaging should be described as refillable or reusable unless it can be refilled or reused for the same or similar purpose and there is a reasonable means for the consumer to do so.
* Refillable or reusable claims for food and beverage containers should be made with due regard to applicable sanitation standards.

### Are your proposed claims comparative in nature? If so, is the comparison to:

* An earlier version of the product, component or package?
* A competitive product, component or package?
  + The basis for any comparison regarding environmental benefits, attributes or burdens should be clear and the conditions of use of the compared product, component or package substantially identical.

### Must the consumer be able to access external facilities (e.g., recycling infrastructure, home composting, municipal composting, etc.) so that the claimed benefit can be achieved? If so, are these facilities reasonably available to the requisite number or proportion of users, consistent with local guidance?

* Limitations on the ability to, e.g., recycle or compost the advertised item should be clearly identified.

### Have you conducted consumer perception research to assess how the claim will be perceived by consumers?

* Remember that the evaluation of marketing communications, including advertisements featuring environmental claims, is based on the net impression of the reasonable consumer or target. Perception research is not mandatory; if not available, the evaluation will be based on a hypothetical assessment.

### If the claim is literally true, could it be misinterpreted to convey a broader benefit? Does it exaggerate the environmental benefit or features?

* Remember that the evaluation of advertisements, including advertisements featuring environmental claims, is based on the net impression of the reasonable consumer or target.

### Is the claimed benefit likely to be realised when the product, component or package is actually manufactured, used or disposed?

* An ad that makes a claim about a feature or benefit that would not likely be achieved in the actual manufacture, use or disposal is likely to be misleading and/or deceptive absent appropriate qualifiers.

### Does the claim involve an environmental commitment or goal that is aspirational in nature and not likely to be met until many years in the future?

* An aspirational claim requires that the company demonstrate that it has a reasonable capacity and methodological approach to meet the claimed commitment or goal in the timeframe advertised.

### Do you use your own environmental seals or logos?

* If a consumer might interpret your own environmental seals and logos in environmental advertising to denote approval by an independent third party, it is likely to be misleading and/or deceptive.

### Do you use seals or logos of third-party organisations? Are their procedures transparent? Are processes for standards adoption in line with recommendations of competition authorities? Will seals and logos be misinterpreted to connote broader environmental benefits than covered by the programme?

* Independent seal organisations should adhere to fair processes in the development of standards. Failure to do so may implicate competition law considerations.
* Marketers should adhere to the standards and guidelines of the seal organisations in using a seal.

### Are appropriate qualifiers clear and prominent, and in close proximity to the relevant claim?

* Qualifiers should generally be presented in readable typeface in a location in close proximity to the claim.
* Consumers are now broadly accustomed to obtaining more information from visiting websites. However, qualifying information must be readily available in close association with the claim. Prompts encouraging consumers to visit a website for more information, or making QR codes and the like available, may be helpful to consumers, but they may not substitute for required qualifiers that must appear prominently and in close proximity to the claim.

### Do you periodically reassess the claim, especially a comparative claim, based on changed circumstances and developments to assure that it remains accurate and not misleading?

* Claims must be current and comparisons clear.

### Are in-house marketers and outside marketing agencies trained to understand legal requirements and recommended best practices in making environmental and sustainability claims?

* Training and education regarding good advertising practices is recommended for all marketing communications.

**Do individuals represented as environmental experts in marketing communications actually have the relevant education, training and experience in the field? If not (for example, if actors are portrayed), are appropriate qualifiers included? Do endorsements and testimonials related to environmental claims meet applicable guidelines for endorsements, and include material connection disclosures as needed?**

* Influencer marketing is a more significant part of the advertising landscape. Advertisers should consult the ICC Code and adopt policies, including training, to assure that influencers and endorsers are aware of general requirements and special considerations for environmental marketing claims.

## About the International Chamber of Commerce

The International Chamber of Commerce (ICC) is the institutional representative of more than

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33-43 avenue du Président Wilson, 75116 Paris, France T +33 (0)1 49 53 28 28 E [icc@iccwbo.org](mailto:icc@iccwbo.org) [www.iccwbo.org](http://www.iccwbo.org/) @iccwbo

4904-3058-4598, v. 1