



# Guide to Sustainable Communication

How to include environmental information in your strategies and campaigns



GOBIERNO  
DE ESPAÑA

MINISTERIO  
DE DERECHOS SOCIALES, CONSUMO  
Y AGENDA 2030



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Ecological impact is a determining factor influencing the consumption decisions and actions of the Spanish and European population. The data show that the increase in the level of citizens' awareness of the climate emergency is considerable and the correlation between greater interest and more sustainable consumption actions is also apparent. This is very good news, because this greater awareness is the first step towards the necessary ecological reformulation of our consumption and production models.

Nevertheless, in light of this progress, new unfair commercial practices have emerged, attempting to cynically exploit this greater environmental awareness among citizens, a practice known as greenwashing. Greenwashing is when companies make vague, misleading or unsubstantiated environmental claims about their products. It is therefore a question of companies who, whether deliberately or not, are acting in bad faith to profit from the greater environmental awareness of consumers. This malpractice generates serious negative impacts in several ways. Firstly, it harms consumers, as they make consumer decisions on the basis of misleading information. For their part, companies that do not engage in these malpractices also suffer from this unfair competition, with those that are genuinely more concerned and committed to improving their sustainability levels being particularly disadvantaged. Finally, from a more global perspective, the dissemination of misleading environmental marketing information also harms the planet and society as a whole, insofar as it undermines the credibility of such claims in general, discouraging efforts by both concerned consumers and companies genuinely committed to improving the environmental impact of their practices.

Unfortunately, as confirmed by the data in this guide, greenwashing, which undermines the efforts of consumers and businesses to move towards a more sustainable consumption model, is widespread. The Spanish and European consumer authorities are aware of the seriousness of the problem, and the regulatory framework is in the process of transformation and improvement. In any case, the eradication of greenwashing requires the active involvement of stakeholders. A targeted, audacious regulatory framework is called for, along with the commitment and effort of the business community to develop appropriate business practices around environmental information. Companies should be the first ones interested in preserving their own credibility and the trust of consumers in their commercial and environmental information.

In short, with this guide, the Ministry of Social Rights, Consumer Affairs and the 2030 Agenda aims to provide traders and the general public with a useful tool to facilitate the development of appropriate sustainable communication policies, providing keys for the correct inclusion of environmental information in commercial strategies and

campaigns. This way, the efforts of an increasingly more aware public and institutions and an increasingly committed business sector will help us to move towards more sustainable consumption.

Bibiana Medialdea García  
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# Executive summary

The main purpose of this Guide is to present the current and future situation regarding environmental claims; claims made by companies about their own actions and about the features of their goods and services as relating to the environment. This document is part of the actions that the Ministry of Social Rights, Consumer Affairs and 2030 Agenda is deploying with a twofold objective: to strengthen the protection of consumers, especially the most vulnerable, and to promote increasingly sustainable consumption patterns. For both objectives, the commitment and good practice of companies are essential, which guides such as this one are intended to facilitate. First, we'll present the main reasons why this guide should be of interest to you.

We will then define some of the most important terms in the world of sustainability communication. What is the difference between environmental claims and social claims? What do we mean by "life cycle"? And what is this much-talked-about "greenwashing"?

Once these definitions have been clarified, we'll show you how to make environmental claims correctly, avoiding the most common traps and mistakes in advertising. At the same time, examples will be given in each section to make it easier to assimilate the contents, including relevant real-world use cases. There is also a section dedicated to climate-related claims.

In short, case studies of good and bad practices will be presented, and advice will be given on how to include environmental information in communication. All of this will be accompanied by exercises to facilitate the understanding of the information.

At the end of this Guide you will find tools to help you self-evaluate your advertising, an appendix with the answers to the exercises and links to websites where you can expand your knowledge of the subject.

# 1. Why are you interested in this guide?

Before we begin, we want to give you two definitions that are key to understanding this guide. On the one hand, there are the environmental claims and, on the other hand, there's what is known as "greenwashing".

**Environmental claims** are all information provided by a trader related to its impact on the planet. Communications can be corporate and/or about products or services. They range from labelling or certifications to advertising campaigns and the design of packaging or websites.

**Greenwashing** is the practice of seeking to gain an unfair competitive advantage by marketing a product or service as environmentally friendly when, in fact, the information is false or not clearly expressed. It also refers to all communications that aim to project a corporate image that is more committed to the planet than it really is. In other words, any environmental claims that are misleading. In Spanish it is often called *ecoblanqueo* (literally eco-laundering) or *blanqueo ecológico* (ecological laundering). In more colloquial conversations, people also talk about *ecopostureo* (eco posturing).

With these two ideas in mind, here is why it is in your interest to continue reading this guide.

## To know the legislation in force

Although we explain it in detail throughout this guide, the general idea is summarised in one sentence: you cannot just claim that your product or service is environmentally sustainable. You need to make sure that your environmental claims are clear and fact-based or they may be considered an unfair practice, in violation of consumer law, in particular Art 47.1. m of Royal Legislative Decree 1/2007, with all that entails.

Punishment can range to **finest of up to 100,000 euros** and could exceed these amounts by up to **four to six times the illicit gains** obtained by such practice.



## Because legislation is about to change

Recent years have seen a proliferation of malpractice in how companies use environmental information. For example, according to a study by the European Commission, 80% of websites, e-commerce outlets or advertisements analysed contained an environmental claim.<sup>[1]</sup>

These claims are not always clear and substantiated and may be misleading for the consumer. Thus, in the previous study, 45% of the total were implicit claims (images or colours suggesting environmentalism), 35% were explicit (logos, labels or text) and 21% were generic claims (e.g. the use of words such as "green" or "eco-friendly").

These trends were confirmed both in the Study carried out for the Impact Assessment of the Consumer Rights Directive to empower consumers for the green transition<sup>[2]</sup> conducted in July 2021 and in the Environmental Claims Sweep<sup>[3]</sup> conducted in November 2020 by the Consumer Protection Cooperation Network (CPC Network). In light of this sweep, which analysed 344 environmental claims, the CPC authorities indicated that in almost half of the cases (42%) they had a reasonable doubt as to whether the claims analysed were false or misleading. In addition, the CPC authorities also found that in more than half of the cases (57.5%) the companies did not provide sufficient information to allow an assessment of the accuracy of the environmental claim.

Therefore, with the aim of protecting citizens and the reputational interest of companies, the European Union is working on two directives that will drastically change the current reality.

- » Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information
  
- » Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on substantiation and communication of explicit environmental claims (Green Claims Directive)

These changes affect all companies, except micro-enterprises, which under the current Proposal would be exempt from complying with certain articles of the Green Claims Directive. However, they will also be able to opt for compliance and corresponding certificates on a voluntary basis if they are interested.

## Because these changes will have significant consequences.

With the entry into force of the Green Claims Directive companies will have to prove, and verify in advance, that everything in the environmental claims is true.

One of the main changes we will see is that, with the exception of some particular cases, generic environmental claims will be included in Annex I of the Unfair Commercial Practices Directive.

What does this mean?

Such practice will be considered "Unfair Commercial Practices" in all circumstances and therefore, where these practices are detected, they will not be analysed on a case-by-case basis (as has been the case up to now) but will be directly declared unfair practices and will be subject to the sanctions described above in the legislation in force.

In addition to the possibility of fines, there are further consequences. For example, as of the date of publication of this guide, the proposed Green Claims Directive sets out, inter alia, the following:

- » Possibility of confiscation of revenues from the marketing of products that do not comply with the criteria set out in the directive.
- » Temporary exclusion from public procurement processes and access to public funding such as tenders, grants or concessions.
- » In some cases, fines of at least 4% of annual turnover.

The spirit of the future directives is to make sanctions effective and dissuasive. The aim is to deprive those who commit misleading or unfounded environmental infringements, or who use environmental labelling schemes that do not comply with the law, of their illicit gains.

You should not overlook the serious impact this could have on the reputation and prestige of your brand.

## What's more consumers are no longer believing what companies tell them

A few facts to illustrate the importance of all this:

- » 72% of the Spaniards say that ecological and social certificates have a positive influence on their purchases.<sup>[4]</sup>
- » In Spain, labelling is the main source of information for consumers, but around 20% consider the information to be confusing and/or unintelligible.<sup>[5]</sup>
- » According to a European Union study, 55.8% of people surveyed said they had been influenced by the environmental impact of at least one or two of the products or services they had purchased in the last two weeks.<sup>[6]</sup>
- » But only 56% trust the environmental claims on the products they buy (down from 61% in 2020).<sup>[6]</sup>

And something you probably already know: most consumers are willing to pay more if the product or service is sustainable.<sup>[7][8]</sup>

So although consumers are involved in sustainability, they are losing confidence in what companies claim.

## And miscommunication can lead to reputational risks

Reputation: that intangible resource of inestimable value for any company is built over time through consistency between words and deeds.

Today, every detail is subject to close scrutiny and open to public opinion. Even the influence of one person with a smartphone can affect a company's reputation in a matter of seconds, without us realising it until it goes viral.

In today's business world, being sustainable is crucial to a good reputation. If we add the fact that society is becoming more and more informed and aware of sustainability issues, it is not difficult to see that those companies that fall into greenwashing and pretend to be green just for appearance's sake run the risk of damaging their image and reputation. In order to build a true image of sustainability and responsibility, we need to be transparent, authentic and consistent.

It is proven that consumers and citizens want practices to be socially and environmentally responsible. If brands do not back up these

commitments in a real way, the public punishes them, leading to declining sales and even public boycotts.

Perhaps the word boycott sounds exaggerated, but a study by GWI<sup>[9]</sup> indicates that 63% of respondents say they have boycotted a brand. And what has led them to do such a thing? The four main reasons are:

- » Behaviour that cause harm to a specific community.
- » Data filtering.
- » Unethical manufacturing practices.
- » Behaviour that is not environmentally friendly.

It seems clear that the reputational risk is there.





## 2. Definitions

Now that you know why this document can be useful to you, let's lay the groundwork for a common language.

There are countless definitions for the **concept of sustainability** but the simplest is: balancing environmental, social and economic aspects to preserve the health of the planet and future generations.

Business, industry, the self-employed, administrations, etc., we all need to enter into discussions and adopt sustainable practices at different levels, depending on our individual situation. We have to find a balance between our economic needs and the needs of the planet.

When we find those paths, we are proud of it and we want to talk about it. New legislation in the pipeline in the European Union will regulate the right way to convey all this information to the public.

Here are a series of definitions that we believe will be very useful for you to fully understand what we are talking about and better understand the regulation.

**Claim:**<sup>[10]</sup> All statements, information, labels, slogans, brand names, symbols, pictograms, brand/corporate strategies, certification labels, certificates and anything else that companies use to promote or encourage sales of their products and/or services.

**Environmental Claim:** Any statement or representation which is not mandatory under Union or national law, including textual, pictorial, graphic or symbolic representation, in any form, including labels, trademarks, company names or product names, in the context of a commercial communication, which indicates or implies that a product or trader has a positive or no impact on the environment, is less harmful to the environment than other products or traders, respectively, or has improved its impact over time.

\* Environmental claims, in short, are statements that use environmental characteristics to argue that their products are beneficial or have less impact on nature. Such communications range from the more general to more specific topics such as soil, sea or climate. The aim of these marketing strategies is to improve brand/product image and increase sales.

**Explicit Environmental Claim:** an environmental claim stated in textual format or contained in a sustainability label. These can be generic or specific.

- **Generic Environmental Claim:** any explicit environmental claim, not on a sustainability label, where the specification of the claim is not provided in clear and visible terms on the same carrier.

\* Examples of generic environmental claims are positive statements that include words or expressions such as "environmentally friendly", "respectful of the environment", "green", "nature-friendly", "eco", "animal-friendly", "cruelty-free", "sustainable", "ecological", "plastic-neutral", "responsible", etc.

These words, because they are not clearly explained and defined, make consumers assume that the product or service does not have a negative impact on the environment or suggest excellent environmental performance.

- **Specific Environmental Claims:** concrete statements that refer to particular qualities of a product or service, such as "Produced with 90% recycled materials" or "We are more environmentally friendly. 25% less plastic than in our previous packaging".<sup>[1]</sup>

**Implicit Environmental Claims:** claims that are inferred, usually by the general impression conveyed by the communication. In other words, we cannot break down the different components of the statement, but as a whole it generates an idea in the receiver.

- » The image: clear skies, forests, mountains, flowing water and animals, the colour scheme of the decor and costumes, the appearance of the characters and who they are if they are well-known individuals, etc.

- » Sounds: the nuances of a tone of voice, the speed and to whom that voice belongs, the sound effects of elements present or not in the image (birdsong, the sound of the sea or river, thunder, the sound of a horse's hooves), music, etc.

The sum of all these elements makes up the statement that reaches consumers.

**Social Claim:**<sup>[10]</sup> any statement or representation that implies that the production of a product or the provision of a service has been carried out in compliance with certain ethical or social standards, ranging from fair working conditions of the workforce, donations, to concern for animal welfare.

\* Any of the claims we talk about to promote a product or service can include the use of visual elements such as logos, colours, stamps or labels, characters or animals, and also sound to help generate the idea that its use or consumption is respectful of the planet.

**Life cycle:** the time span of existence and usefulness of products. That is, the consecutive and interrelated stages of a product's life, ranging from raw material acquisition or generation from natural resources, pre-processing, manufacture, storage, distribution, installation, use, maintenance, repair, upgrading, refurbishment, reuse and finally end-of-life.

**Trader:**<sup>[12]</sup> natural person or legal entity who, in commercial practices, is acting for purposes relating to trade, business, craft or profession, as well as anyone acting in the name of or on behalf of the trader.

**Consumer:**<sup>[12]</sup> any natural person acting for purposes which are outside his or her trade, business, craft or profession.

**Average consumer:** a person who is reasonably well-informed and reasonably observant and discerning, taking into account social, cultural and linguistic factors.

\* This concept is particularly important as the expectations that may be generated by an environmental claim in a particular environment or countries may differ greatly from others and will need to be taken into account on a case-by-case basis.

**Eco-laundering:** also known as **ecological-laundering or greenwashing**, is a practice that seeks to gain an unfair competitive advantage by marketing a product or service as environmentally friendly when, in fact, the information is untrue or not clearly presented.

**Sustainability Label:**<sup>[13]</sup> any voluntary public or private trustmark, quality label or equivalent, which aims to differentiate and promote a product, process or company with reference to its environmental and/or social aspects. This does not include any mandatory labelling required under domestic or European legislation.

**Environmental Label:**<sup>[14]</sup> sustainability label covering solely or predominantly the environmental aspects of a product, process or trader.

**Product:**<sup>[12]</sup> any good or service, including immovable property, as well as rights and obligations.

**Sustainability/Sustainable Development:** a very broad concept on which many authors have written and which is debated in academic circles. We adhere to the official UN definition in UN Resolution 66/288 of 2012. "Sustainable development is meeting the needs of the present without compromising the ability of future generations to meet their own needs." We need to understand that this statement includes the protection of the environment, biodiversity, climate, public health, animal welfare, human rights, labour conditions and fair trade.







## 3. Your environmental claims: how to get it right

Making any environmental communication or claim without falling into unfair practices is not as complicated as it may seem, but it does require an effort to abandon the formulas used so far.

You will need to carefully analyse each statement and ensure that you adhere to the following best practices.

### I. Clear, simple and specific language. Avoid using general concepts

When describing an environmental benefit, **keep it simple**. The aim is for the statement to resonate with the company's target audience and to be intelligible to the **average consumer**. Simple language, accessible to everyone, will be essential to achieve this.



### LET'S TAKE AN EXAMPLE...

The company wants to act on its water footprint and has started by implementing an offset programme in which it collaborates with NGOs to clean up a river near its facilities.



### INCORRECT

They include the claim "we give back to nature the water we use" on the product packaging. This statement confuses consumers for several reasons: by helping to clean up the water in a river, you are not giving back any of the water used, you are engaged in offsetting; it does not explain how the water is "given back" and may imply that it refers to the total water footprint of the corporation.



## CORRECT

They include on the product packaging the claim "we offset 25% of the water we use in the production of our product by 2022" and add a link to the website or a QR where anyone can find information on the company's water footprint and action plans.

Sometimes, we fall into the trap of wanting to offer simplified information in order to satisfy everyone. To achieve this, **generic claims** are used. These are words that sound great at first, but when analysed, on their own, say nothing and consumers can imagine whatever they want, whether it is true or not. The limit, in many cases, is your imagination. This will lead to problems as it generates misleading statements. The way to avoid this is to use more concrete statements, explaining what the claim refers to and expanding on all supporting information. Seeing them without explanation will set off greenwashing alarms.

## WORDS YOU SHOULD BE CAREFUL WITH



We leave you with a series of **words and expressions** that are commonly used in generic claims:

- » "not harmful to the environment",
- » "environmentally friendly",
- » "green",
- » "friend of nature",
- » "echo",
- » "animal-friendly",
- » "cruelty-free",
- » "sustainable",
- » "ecological",
- » "plastic neutral",
- » "responsible",
- » "environmentally correct",
- » "climate-friendly",
- » "environmentally sensitive",
- » "deforestation-free",
- » "carbon neutral",
- » "climate neutral",
- » "energy efficient",
- » "biodegradable",
- » "biological origin",
- » "conscious".

Like everything else, **there are exceptions and nuances**. For example, you could use the term "organic" or "eco" if you refer to a product that is already certified organic according to existing regulations such as the European Regulation on organic production and labelling of organic products.<sup>[15]</sup>



## LET'S TAKE AN EXAMPLE...

A brand of food products that uses environmentally friendly products.



### INCORRECT

Simply describing products as "sustainable". It is not explained what this concept refers to, therefore, consumers may think that its benefits are greater than they actually are. This is unhelpful information that will lead to mistrust in the purchasing process.



### CORRECT

Include specific and understandable information on the environmental benefits of the products. "Our maize is grown without pesticides" or "Zero-kilometre maize or Harvested and processed within 100 km". By avoiding the use of ambiguous words, statements are more concrete and product features are better explained. This provides quality information that helps consumers.

When describing the positive qualities of a product, marketing teams will need to be clear and specify which **part or parts are affected by these benefits**. This reduces the chances that the statement will be misinterpreted and the company will lose the trust of its audience. Consumers must be prevented from misinterpreting the statements that are put out there.



## LET'S TAKE AN EXAMPLE...

A company that sells coffee filters wants to include on packaging that 30% of the packaging is made from recycled materials.



## INCORRECT

On the product packaging, there is a label that says "30% recycled material". This statement only refers to the cardboard packaging and not to the filters, but this clarification has been omitted. This omission of information misleads consumers into thinking that the claim refers to the whole product and not only to the packaging.



## CORRECT

On the labelling of the filter packaging, the following statement appears: "packaging produced with 30% recycled material". This way, there is no room for misinterpretation of information.

Statements need to be clear and **differentiate when they are talking about the company's actions and when they are talking about those that affect the life cycle of a product**. These features cannot be transferred, as it would generate confusing statements. No matter how hard a company is working to reduce its impact on the planet, if one of its products is not sustainable, it cannot attribute qualities to it that it does not have.



## LET'S TAKE AN EXAMPLE...

A technology company. At their facilities they have implemented all kinds of measures to reduce their environmental footprint. For example, all the companies' buildings operates are designed and built with a focus on the conservation of resources, remote work is facilitated and the use of public transport is encouraged. They also donate their surpluses to NGOs for educational purposes and promote volunteering among staff. However, they have not been able to reduce the impact generated by their flagship product.



## INCORRECT

The box of the flagship product reads: "The name of the company: towards a more sustainable society" and

a QR that links to all the information on the company's environmental and social plans. This is data that affects the company, but it does not differentiate what happens in the product life cycle. All the information provided is true, however, they omit the information about the linked product. The company's profits are thus attributed to the product.



## CORRECT

On the box of the flagship product you can read this other statement: "Product Impact Information" and a QR that gives access to all product life cycle information. In the link, we also find separate information on the company's activities and efforts. This way, the company's measures are differentiated from those concerning the product itself.

## II. Relevant and useful information

Care must be taken in both the choice of which feature to highlight in statements and how to do so. Marketing teams need to be **consistent** and convey in a balanced way the importance of the selected feature in the overall footprint of the company or product/service. The information conveyed has to be useful for consumers. Statements have to help in an honest way in the buying process to choose one product over another.

Often, a certain feature is magnified by giving it more importance than it really has. This leads the public to believe that the environmental benefit is much greater than it actually is. In some cases, it goes as far as talking about "plastic-free paper" or "gluten-free water". This is misleading, and to avoid it, benefits should be shown as objectively and impartially as possible. The aim is that those who are informed about the product can make decisions based on honest and truthful information.

It is important to keep in mind that there has to be a balance between the environmental benefit and the scale of the campaign. We cannot forget that when we talk about the environmental attributes of the brand/product we have to convey the real importance they have for the company.



## LET'S TAKE AN EXAMPLE...

A company dedicated to the sale of cleaning products. The 3 main components of their flagship product are toxic and pollute the water. So the R&D department is researching for solutions and has managed to reduce the consequences of one of the ingredients by 20%. It should be stressed that this is not a legal requirement, but a voluntary implementation by the company.



### INCORRECT

A communication is launched at the point of sale and on the website that describes the "new benefits" of the product using general claims such as "New, more sustainable formula. We care about our water." These statements are inaccurate and mislead readers. They imply that the new formula improves water quality, while it actually pollutes less. Based on a small improvement of a product, the public is led to believe that by using it, the environment is being improved. The information that the product pollutes water is concealed (see guideline III).



### CORRECT

Communicate at point of sale the implementation of the improvement "New formula: 3% reduction in toxicity. For further information see our website" and the improvements and the studies that support them will be included on the website in a visible and understandable way. This is sensitive information, as the degree of toxicity of the product must be explicitly conveyed to explain the reduction and thus make available to those who may be interested in consuming or purchasing the product all the necessary and relevant information for decision making.



## LET'S TAKE AN EXAMPLE...

Company Z has implemented a plastic reduction policy. One of the measures to achieve this has been to

redesign a package. So they have removed a small plastic window in the packaging of one of their products. This change is an improvement that applies to 5% of the total packaging. How should it be told?



### INCORRECT

To create an entire advertising campaign to promote this measure would be unconscionable. The company's final data on plastic reduction is low. In other words, the overall savings on this material are very small. Therefore, being the main argument is not consistent with reality.



### CORRECT

Include a statement on the packaging referring to the reduction of plastic use. Publish an article on our website. Modify the publicity we have and include a brief mention of this aspect.

## III. Do not withhold information

The omission of important **environmental information relating** to the impact can influence consumer decisions. If we hide this type of information we will be producing misleading statements.

Consumers must be able to obtain sufficient information about the product to make rational consumption decisions.



### LET'S TAKE AN EXAMPLE...

The packaging in which a product comes is made of plastic and the company would like it to be made of a "compostable" material to reduce the impact on the planet. They carry out the appropriate modifications and proceed with the launch.



## INCORRECT

The word "compostable" is included on the packaging with no further explanation. Important information necessary to understand this statement is being withheld. The average consumer may interpret this package as being suitable for their home composter. There is no getting away from the fact that there are different composting processes and the company's obligation is to explain which one(s) its material needs. An industrial composter is not the same as a home composter. The temperatures and times required for composting are different in each case.

Sometimes there is not enough space to provide all the relevant information. When this happens, the solution is to indicate where the information is publicly accessible. However, in this example, this possibility is not offered either.



## CORRECT

The word "compostable" is included on the packaging and the conditions necessary to achieve this are explained: "Compostable in industrial composter in 6 months". In addition, the definition of compostable is included on the website, as well as the studies that prove and explain the claim. This leaves no room for interpretation.



## LET'S TAKE AN EXAMPLE...

A food company that sells reineta apples. The packaging shows the origin of the product, which is domestic. However, the product's journey to the point of sale is much longer than it might seem.



## INCORRECT

On the box of the product it is claimed to be a local product in the form of a promotional claim. However, it omits the specific origin of the goods, so that the route



taken from their origin to the point of sale is not known. A consumer looking to buy local products with reduced environmental impact could be misled by such an omission.



## **CORRECT**

When selling apples, all necessary information is provided on the life cycle stages and other relevant aspects, including the specific origin of the product. This way, consumers will be able to make rational consumption decisions on the basis of this information.

## **IV. Updated information**

Statements that are delivered to the public may become outdated over time, therefore, all information provided should be updated periodically and/or when there are changes or modifications that may have an impact.

Developments may relate to changes in production processes, changes in legislation, updated reports on greenhouse gas emissions or the publication of new IPCC (Intergovernmental Panel on Climate Change) studies that affect the corporation's scales. Long-lasting information media such as websites or packaging need to be kept up to date.

The frequency with which content is reviewed will depend on the type of product or service and the sector.



## **LET'S TAKE AN EXAMPLE...**

A company dedicated to the manufacture of household appliances. There has been a change in energy labelling regulations leading to changes in the labels of some of the products they sell.



## INCORRECT

On the website, on the labels attached to the products and on the packaging, the "A" rating is maintained. This is unfair information. The company is already legally obliged to update the new labelling and information.



## CORRECT

On the website, when defining each product, it is explained that although it currently has a "B" rating, this is due to an update of the regulation and that according to the previous criteria the product had an "A" rating. We will have to update all those images where the energy label appears.

Companies are proud of their progress and also want to keep sustainability information up to date. So they update their progress. When such renewals of information are carried out, the actual data must be provided and the information must be treated consistently.



## LET'S TAKE AN EXAMPLE...

A food company and its plan to reduce single-use plastics.



## INCORRECT

Under the heading "Annual update" they include the sentence "We have reduced our consumption of single-use plastics by 50%". Under the heading "Annual update" it is implied that a reduction has been made this year compared to the previous year. However, the text refers to the total reduction since the implementation of the measure.



## CORRECT

Under the heading "Annual update" they included the sentence "We have reduced our single-use plastic consumption by 3% from one-time use."

We are halfway to reaching our 2030 target".

## V. Fair comparative claims.

When using comparative claims on the sustainability of different products, care must be taken to avoid confusion. It should be clearly specified which products are being compared and ensure that they are similar in type and function. It would not make much sense to link a washing machine to a refrigerator. Some criteria to take into account when making comparisons are:

- » The results for comparison must be consistent. In order to do so, baseline information, data and their use must measure the same environmental impacts.
- » The stages of the life cycle or value chain compared must be the same.
- » The methodology of comparison should be the same for the products or services being compared.
- » When comparing product upgrades, it is necessary to explain how the upgrade affects the product and to mention the reference year.

Comparative claims, when comparing essential, relevant, verifiable and representative aspects and is not misleading, are a legitimate way of informing consumers of the benefits they can obtain.



### LET'S TAKE AN EXAMPLE...

Company dedicated to the sale of cleaning products. One of its detergents pollutes less than any other detergent in the same range offered by its competitors in the same country. The decision has been made to take advantage of this and to publicise it.



### INCORRECT

On the detergent packaging it reads "Greener detergent". This sentence violates a number of good practices. First, generic concepts such as "green" should be avoided because they imply greater benefits than they actually have; as already

explained in other examples (see guideline I) such terms should only be used if their meaning is specifically stated. In this particular case, the detergent contains chemicals that are harmful to the environment, even if its impact is less than that of its competitors, its use is not favourable for the planet. Besides, in this claim we are making a comparison, but we do not explain with whom. An average consumer may understand that we are ahead of the competition and another that this formula is better than the previous one. No evidence is provided as to why this detergent is more environmentally friendly, in what respect, nor is it indicated where such explanations can be found.



## CORRECT

The detergent, the packaging reads: "Our detergent is 35% less toxic than the competition.\*" The explanation of the asterisk is the following "\*Comparative study between the 5 leading detergents on the market in Spain in 2022" and a QR that leads to a web page where the full report is available. All data must be kept up to date. However, we should not keep these statements in, for example, 2026 as they would not provide relevant information.

## VI. Information supported by research

Before making a claim, one must be able to prove it; not the other way around. The studies carried out by the corporations must be made available to the authorities at all times. In order to keep consumers informed, companies will consider, on a case-by-case basis, whether to publish summaries of the studies or the full studies. We must not forget that information overload can turn into misleading information.

There is a need for **up-to-date scientific evidence** corroborating the characteristics and/or benefits to be promoted. The studies on which the claims are based must be robust and provide sound and widely recognised scientific evidence.

Data shall be provided in units of measurement that can be easily understood by all. In addition, they should be carried out using the most developed technical expertise.

The details of a study should include information such as the evaluation method used, the tools used, the limits of the system, the sources, etc.



## LET'S TAKE AN EXAMPLE...

A company dedicated to the manufacture and sale of small household appliances. They have upgraded a vacuum cleaner model and to be able to talk about its energy efficiency, the required tests have been carried out.



### INCORRECT

To claim that the new model vacuum cleaner consumes 20% less electricity than the previous one and reference the corroborating study. However, an analysis of the data in the report reveals that the tests have been conducted in a laboratory, under conditions that could not be replicated in the average household. This company is providing misleading information that presents a product as being better for the environment than it really is.



### CORRECT

To claim that the new vacuum cleaner model uses 15% less energy than the previous one, have studies to back up the claim and make all the information available to consumers. The tests replicated the conditions that exist in a conventional home and in the actual spaces in which the vacuum cleaners are used.

A good practice for companies to follow is to provide the general public with access to scientific studies that demonstrate that all information provided by the company is accurate. However, a balance must be struck between providing truthful information and providing too much information that could further confuse the public.

It is up to the company to provide this data in physical or digital form. Often there is not enough space to add full documentation, but there

is space to provide a web link or a QR. Thanks to new technologies, the easiest option is to place them on the brand's website or on a *landing page* created for this purpose.



## LET'S TAKE AN EXAMPLE...

A company dedicated to the sale of dairy products. In recent years they have launched a plan to reduce their impact on the planet. Some of the measures implemented are the reduction of the size of labelling and the use of local suppliers.



### INCORRECT

On the yoghurt packs, the claim "our company is greener than ever" appears. No further details, additional information or links are provided. As explained above, such practices project a misleading image to the average consumer.



### CORRECT

The yoghurt packs read "we work with 100% local suppliers". The product has a reference and a QR code that takes us to a third-party study that corroborates this claim.

## VII. Future objectives backed by credible plans that can be implemented

Many companies make promises about the targets they plan to achieve in the coming years. Unfortunately, we find that these promises, more often than not, are empty and unsubstantiated by real facts.

When the statement to be conveyed is about where the company is projected to be in the coming years or decades, realistic and feasible plans must be in place, taking into account the company's present situation . **Commitments and targets must be clear, objective and publicly available.**



Our plans for the future should have a detailed and realistic implementation plan including **measurable objectives**, with **time-bound** and other elements necessary for their achievement, such as the allocation of resources. In addition, they must be **checked** periodically by an **independent third-party expert** and the results of this verification shall be made available to consumers.



## LET'S TAKE AN EXAMPLE...

A food company committed to reducing the consumption of single-use plastics.



### INCORRECT

The company launches a commitment to reduce single-use plastic by 90% by 2030. However, the facts do not support that claim. On the one hand, if we look to the future, there are no measures to help replace plastics. On the other hand, an examination of the pathway shows that the consumption of these plastics has increased over the last 5 years. Therefore, the statement is unfounded and does not correspond to the actual operation of the company. Moreover, these commitments, and the way they are estimated, have not been externally verified.



### CORRECT

The company reports that it will reduce single-use plastics by 90% by 2030. In recent years, thanks to the policies and measures put in place, the consumption of these plastics has been progressively reduced at all stages of the workflow. According to verified third party reports, if this behaviour continues in the future, the company will reach its target.

## VIII. Don't boast about something that is required by law

A product feature that is in fact mandatory by law should never be sold as an exclusive or differentiating feature. This could lead consumers to believe that the product in question has more advantages than the competition.



### LET'S TAKE AN EXAMPLE...

A paint company that has been in existence for more than 30 years. They want to communicate their commitment to the environment to their target audience.



#### INCORRECT

The company markets aerosols. The homepage of the website, which is old and has not been updated for many years, still trumpets that "we help protect the ozone layer, no CFCs", a statement used in the early years of the company to differentiate themselves from the competition. However, although the ozone hole is still a problem (now recovering), CFCs have been banned since 1995, so it should not be communicated.



#### CORRECT

On the homepage, statements about polluting chemical reduction practices are posted. It is also about the importance of companies being sustainable and taking care of social and environmental aspects.



### LET'S TAKE AN EXAMPLE...

A cosmetics company wants to promote one of its sunscreens.





## INCORRECT

The packaging of the sunscreen reads "No added microplastics". These microplastics have recently been banned in the EU, so not including them is nothing to boast about.



## CORRECT

If, before the ban, the product contained microplastics, it would be possible that on the website and in the dossier attached to the product which includes explanations about the product, it could be stated that the product has changed its formula to comply with the new European legislation banning microplastics in cosmetics, but this should not be included on the product as an environmental claim.

## IX. Labels based on certification systems.

An environmental label or seal cannot be an invented visual aid to illustrate how committed a company is to sustainability. In order to include labels and stamps in an appropriate way, some guidelines must be followed.

Steps to follow for correct labelling:

- » Environmental labels or seals should be based on certification schemes or be established by public authorities
- » Environmental labels or seals must be reliable and transparent
- » Environmental labels or seals are intended to be simple and easy to understand

When a sustainability label or seal is used to say that a product is good or environmentally neutral, or better than others, we are talking about an environmental claim. So we must follow all the recommendations already explained in order to be able to use them transparently.



## 4. Environmental climate claims

Using climate-related claims correctly can be a major challenge, so we felt they deserved a separate section.

Climate-related claims are those that make statements about the impact of a corporation, product or service on climate change or the transition to climate neutrality (in terms of greenhouse gas emissions, for example).

In spring 2023, a Eurobarometer survey on Climate Change indicated that 86% of the Spanish population considers climate change to be a very serious problem, while 36% consider themselves personally responsible. In a world preoccupied with environmental impact reduction targets, climate-related claims are of paramount importance.

### But how should these claims be communicated?

It is important that consumers are aware of the efforts made by companies to mitigate climate change. Among these efforts, the offsetting of greenhouse gas emissions play a major role.

When communicating efforts based on CO<sub>2</sub> equivalent offsets, the following golden rule should be taken into account: communications should **avoid creating the false impression among the public that the consumption of these products and/or services has no environmental impact** from a climate point of view.

Examples of claims that may project this false impression would be "climate neutral product" or "climate offset product" where this claim is dependent on offsets made by the company. Such claims run the risk of misinforming consumers into thinking that the product has no harmful effects on the environment or the climate. In short, climate claims, both product claims and company claims, must be clear and implemented in such a way that the average consumer understands the information contained therein.

Climate claims are also widely used when referring to companies' future commitments. Of particular relevance in this case is guideline number VII dedicated to the Future Objectives (see guideline VII). These must be set out in a plan with time-bound commitments and the capacity to deliver.

In general, as an alternative to climate claims that may be misleading to the public, we can use expressions such as "We contribute or collaborate in the fight against climate change because..." as they may be more appropriate and more in line with reality.



## LET'S TAKE AN EXAMPLE...

A company wants to communicate its progress on fighting climate change and reducing emissions.



### INCORRECT

Our company says it will achieve net zero greenhouse gas emissions by 2050. However, our emissions have grown exponentially in recent years and we have no sustainability plans that allow us to reduce them over the long term, we have not invested sufficiently in changing our processes and/or it is technologically unfeasible, so our statement does not correspond at all with our real operations.



### CORRECT

Our company says it will achieve net zero greenhouse gas emissions by 2050. To this end, we have an implementation plan that has led to a progressive reduction in emissions in recent years. According to verified reports, it would allow the company to reach its target if it were to continue on the same path as before.



## LET'S TAKE AN EXAMPLE...

An alcoholic beverage company brings a new product to the market claiming it is carbon neutral.



### INCORRECT

The company includes a green and kraft design on the labels indicating that it is a "double zero" drink: Zero sugar and Zero Carbon. However, a calculation of the carbon footprint has not been made for the product over its entire life cycle, but for the organisation. The company then offsets the emissions proportional to the litres of this new beverage sold in the year against the company's total with other products through a national offset programme.



### CORRECT

This case is a complex one in many ways. On the one hand, the use of colours in labelling is not the most appropriate because it reaffirms the appearance that we are dealing with a sustainable product or one that does not impact on the environment. There has also been no analysis of the product throughout its life cycle, so the carbon footprint of the organisation, however offset, is not a valid figure. Finally, the claim "Zero Carbon" implies that the production of the beverage generates no emissions, when this is not true. A suitable alternative would be to make a claim not focused on the product but on the company's contribution, through its offset mechanisms or climate targets.





## 5. Some real examples

In addition to the above examples, we have included a number of real cases to analyse. The reality is that most of the cases involving environmental claims are still subject to litigation at the time of writing this guide, so we do not have a very large sample yet.

We hope that the examples below will help you fully understand the complexity of this issue.

You will see that sometimes different errors from those explained in the previous section are combined.



### EXAMPLE 1

A coffee company with a product line of coffee capsules. Recycling of these materials cannot be carried out at most recycling plants where they are placed on the market, but in some places they can.



#### INCORRECT

Indicate on the packets that if the capsules are emptied, they can be thrown away in the packaging container for recycling. While it is true that there are some recycling plants that can handle this type of waste, in most parts of the country this is not possible, so this is misleading information as it is not a reality that is accessible to most people today.



#### CORRECT

Inform on the packaging that the capsules can currently only be recycled if they are deposited in special containers distributed in different parts of the country.

Include a website and/or a QR to help consumers find a location near them.



## EXAMPLE 2

Paint company that sells aerosol paints within its portfolio.



### INCORRECT

We sell an aerosol can that includes the following claim "Chlorofluorocarbon free". However, their manufacture and importation is prohibited in the European Union. It is therefore not an added advantage, but a legal requirement. This statement attempts to differentiate the company from the competition based on a supposed advantage that does not really exist.



### CORRECT

In this case, it would be correct not to include such information anywhere on the packaging. In many cases it is best advised to refrain from making any environmental claims at all.



## EXAMPLE 3 <sup>[10]</sup>

A company dedicated to the sale of household appliances wants to promote its new washing machine model.



### INCORRECT

"This washing machine consumes 30% less energy. Good for the environment, good for your pocket". In truth, however, is that this reduction in consumption is only achieved when the "Eco" programme is used. This is a misleading statement due to the lack of detail.



## CORRECT

"If you activate the "eco" programme of this washing machine you will consume 30% less energy than using any other programme. Good for the environment, good for your pocket". This way consumers are receiving all the information about the benefits of the product and the statement is reinforced so that they use the product in the way that generates the lowest environmental impact.



## EXAMPLE 4 <sup>[10]</sup>

An airline promotes its services and claims to have the lowest greenhouse gas emissions in the sector.



## INCORRECT

The company claims to be "the greenest airline" with "the lowest CO<sub>2</sub> emissions of all major airlines". In its advertising, the airline compares its CO<sub>2</sub> emissions per passenger-kilometre with those of four other "big" European airlines, and shows that it has the lowest CO<sub>2</sub> emissions per passenger-kilometre. However, a look at the total data shows that the airline's total CO<sub>2</sub> emissions are higher than those of other airlines. What's more the airline's total CO<sub>2</sub> emissions have actually increased significantly over the last five years. When taking into account overall CO<sub>2</sub> emission numbers, claims of being "the greenest" and having "the lowest CO<sub>2</sub> emissions" can, in combination, be misleading because they paint a better picture of the company than the facts warrant.



## CORRECT

The airline can claim to have the lowest CO<sub>2</sub> emissions per passenger-kilometre compared to the other four major European airlines.



## EXAMPLE 5

A supermarket chain modernising its delivery trucks and new ones running on biodiesel.



### INCORRECT

"On our way towards a greener future, together with (*name of biodiesel supplier*)" on the truck. This is a vague and generalised statement because really it can mean anything. The average consumer does not know why it is sustainable, they may be under the impression that the supermarket chain has many environmental benefits, when all it has implemented is that its trucks run on biodiesel.



### CORRECT

Therefore, it is better to use a concrete statement such as "This truck runs on biodiesel".



## EXAMPLE 6 <sup>[16]</sup>

An oil company launched a television advertising campaign featuring a car covered in grass. The vehicle refuelled and left a path of flowers as it drove away. The claim of the campaign was: "5% less CO<sub>2</sub> Same price, better for the environment".



### INCORRECT

The use of elements such as flowers, grass, green colours and the like certainly give consumers the impression that the product is not harmful to the environment. Consequently, such elements should not be used in marketing unless an environmental benefit can be reliably and accurately demonstrated. The company was unable to demonstrate any benefit to the planet on the basis of a life cycle analysis and the marketing was therefore considered misleading.





## CORRECT

In this case, the use of visual elements associated with sustainability without a real informative purpose should be avoided. It should also be confirmed that this emission reduction is real and not a legal requirement arising from some European standard, as legal requirements should not be dressed up as environmental claims.



## EXAMPLE 7 <sup>[16]</sup>

An electric car was marketed under the slogan "A CO<sub>2</sub>-neutral alternative to the petrol car".



## INCORRECT

In order to be able to make this claim, the manufacturer would have to have calculated the total greenhouse gas emissions of the vehicle over the entire life cycle. In this case, it did not, so it was not possible to prove that the total emissions were zero. Consequently, it can be said that the marketing was misleading.



## CORRECT

The manufacturer should have calculated the life cycle emissions of the product before making the claim. In any case, a suitable alternative would be to make a claim referring to the company and indicating its activities contributing towards CO<sub>2</sub> neutrality.



## EXAMPLE 8 <sup>[10]</sup>

An online clothing shop offers the possibility of selecting products under the description "Sustainable". Those who use this filter will see a list of items with the descriptor "Sustainable".



### INCORRECT

However, the platform omits to explain the criteria that lead to the identification of these products as sustainable. The use of the filter "sustainability" and the statement "sustainable choice" are unclear and misleading. In the fashion sector, sustainability can refer to water consumption, the non-use of pesticides for organic fibres, the use of recycled materials, fair working conditions for the stakeholders involved in the process, etc.



### CORRECT

The online shop uses the filter "sustainable" and when selecting each product it is explained exactly what makes it a "sustainable option".



## EXAMPLE 9 <sup>[17]</sup>

An energy company wants to advertise its renewable energy operations. However, two thirds of the company's annual budget is spent on oil and gas.



### INCORRECT

An advertisement is published saying "Europe is READY for cleaner energy", with our logo.



### CORRECT

Instead of omitting relevant information regarding our operations, we report the decline of the budget allocated

to fossil fuels, with the aim of gradually replacing it with renewable energies only.



## EXAMPLE 10 <sup>[18]</sup>

We are a car company, and we want to explain the advantages of the engine in our latest model.



### INCORRECT

Our advertisement claims our engine is “more environmentally friendly”, without providing the necessary evidence to explain this environmental advantage.



### CORRECT

We replace generic expressions with data from reliable and accessible studies. At the same time, we explain what the new model brings in terms of environmental features compared to previous models.





## 6. Practical exercises

In order to put into practice the knowledge acquired in the guide, we propose the following self-assessment exercises. These will be used to review how environmental claims are properly made.

After all, practice makes perfect.



### How do I say that?



Below there are possible advertisements with various environmental statements. Some of them are right and some of them wrong.

We encourage you to try identify the right ones for each case. You will find the solution in Annex I of this guide.



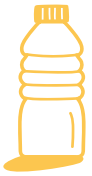
**Potatoes:** Our potatoes are the greenest on the market. By buying them, you help keep the planet clean and green for everyone. We use organic farming techniques. It is proven that our potatoes are the most environmentally friendly on the market. Don't listen to what they say about us, trust Patatas Pepe. (The bag contains a picture of a forest adorned with a river and wild animals).



**Detergent:** We remove stains without harming the planet. Contains sodium bicarbonate (only 0.1%). 40% recyclable packaging. We are the least polluting in the sector according to our own analysis. Our products will no longer be toxic by 2035. Help us to treat Mother Earth better. #PlantTrees



**Textile sector:** (The model is a well-known activist). Jacket made from 100% organic material. A must-have. Comfortable and environmentally friendly. "With 0.05% less toxic substances". Our fashion is the greenest of all. Wear the colour of sustainability.



**Single-use plastic bottle with biodegradable cap:**

Packaging with an image of a waterfall. Low impact bottle. There is a QR showing the life cycle impact of the bottle. Twice as much recycled materials as before (from 2% to 4%). Biodegradable. Healthier for people and animals. We generate less waste than any can of soft drinks.

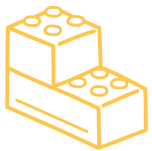


**Banking sector:** (Bank that invests billions in oil and natural gas projects). We have made every effort to reduce our environmental impact. Our offices are now equipped with solar panels. We are true leaders of the green transition. Invest in the health of the planet, invest in us.



**Plastic rubbish bag:** Name of the company: OrganiCo.

The bag says "Recyclable". Made from plastics salvaged from the ocean. Displays the environmental impact of the product on the website, in English.



**Bioplastic toy:** Action figure called "The Recyclable Man". Plastic-free. More environmentally responsible. With toys like this we have reduced the presence of plastics in our figure manufacturing processes by 5% by 2023.



**Wooden table:** Our wood doesn't rot and doesn't require the use of varnishes or paints and is environmentally friendly. FSC Mix certified. Wood grown in the best way for the environment. Add green value to your home.



**Paper napkins:** Compostable in a home composter in 4 months, see our website for more information. Our product composts 30% faster than the industry leaders. By using us, you clean nature as well as your home.



**Jewellery:** Non-polluting. This product contains 80% recycled gold. Our boxes are 100% recyclable.

## Complete the ad



Select at least one correct and transparent environmental claim from the options presented to fill in the gaps in an advertisement.

### AGRICULTURAL COMPANY

*We are more sustainable than before....*

- In recent years, we have been focusing our efforts on saving water
- Giving back to the Earth what belongs to it
- We have reduced our water consumption
- We reduced our water consumption by 30% in 2023
- We are green agriculture

### BAG

*Our bags now have a lower environmental impact.  
This bag is...*

- Compostable
- Compostable at a minimum temperature of 50°C
- Compostable depending on environmental conditions- industrial composter
- Reusable

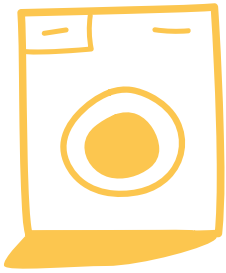
### AEROSOL

*It's important to take care of our planet. This aerosol...*

- It's free of chlorofluorocarbons
- 7% less toxic ingredients than our previous model
- Clear your throat and the planet

## WASHING MACHINE

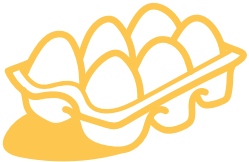
*We've improved our energy efficiency. This washing machine...*



- Consumes 20% less energy
- Consumes 20% less energy on the "eco" programme
- It has the best energy scores on the market
- It consumes around 220 kWh per year with regular use and a 30°C programme, according to third party studies which you can consult [here](#)

## EGGS

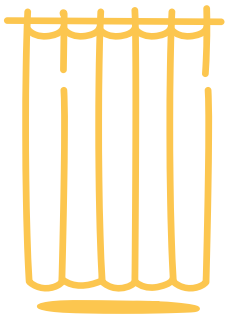
*Quality eggs...*



- Free-range, organic fed hens (eggs are numbered 0)
- If you buy other brands' products, the planet will suffer
- If you support us, planet Earth will thank you
- Our products adhere to the latest environmental standards

## CURTAINS

*All our curtains are.*



- Made of oceanic plastic/microplastic-free
- Made from 30% recycled plastic
- 100% organically produced
- Made from materials whose transport (by our suppliers) is 50% electric

## BAGS



*This bag is...*

- Designed to contain recyclable materials
- Made from 25% recycled plastic
- Made from 5% more recycled plastic than the competition
- Designed by a company to phase out single-use plastics (includes a link to more information explaining the whole process and what's been done so far)

## AIRLINE

*We are proud to be...*



- The airline with the lowest emissions in the sector
- Sustainable aviation
- A company that is starting to apply electric and hybrid technology in its operations, having replaced part of our diesel pushback with new electric models
- A company that protects everyone's future
- A company that communicates its environmental impacts publicly (access to studies)

## COSMETICS

*New sunscreen...*



- No added microplastics
- Oxybenzone-free
- New, more environmentally friendly formula
- It protects you and the oceans at the same time





## 7. Checklist

To make your work easier, we have generated a checklist<sup>[19][20]</sup> to help you analyse your future environmental communications and claims.

- Is information conveyed in simple, clear language and in an objective manner?
- Have you avoided the use of generic claims?
- If the statement refers only to a specific part of the product, have you specified this clearly?
- Does the claim clearly indicate to which stage(s) of the product life cycle it applies?
- Is the statement and its meaning easily understandable for the for the average consumer?
- Does the statement refer to an important achievement in sustainability with a real impact?
- Is all the necessary and important information provided?
- Is the claim specific and relevant?
- Is it based on real data you already have?
- Is environmental information up to date and regularly reviewed?
- If you compare, does what you compare really have the same use or function?
- Are you using the same method to compare, taking into account the same life cycle stages or the same value chain?
- Are you comparing yourself to a product, service or business that is still on the market?
- Are the claims in your ad based on scientific evidence?

- Is the information or source of evidence easily accessible, allowing consumers to find out for themselves?
- Are your commitments and targets clear and verifiable by an independent monitoring system?
- Are your future plans feasible and achievable?
- Do you avoid claiming features and ingredients that would normally be in your product anyway as advantages? The same goes for the absence of features or ingredients that would normally be absent.
- Have you made sure that what you are claiming as an advantage is not something that is already legally required?
- Do you use recognised, third party verifiable, appropriate, reliable and easy to understand seals and labels?





## 8. Who do I turn to if I need guidance?

In Spain, we can seek **legal advice** if we have any doubts regarding our environmental campaigns.

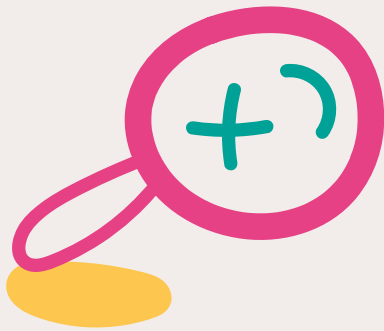
This advice may be provided by self-regulatory bodies, professional legal, advertising and/or sustainability experts among others, and is sometimes referred to as "Copy Advice", but it is not an exclusive term.

As part of this advice, experts are tasked with analysing our communication to ensure compliance with regulations and thus avoid potential breaches and reputational risks.

This advice is provided on a confidential basis and reduces the risk of infringement of advertising regulation rules, but it cannot completely eliminate this risk: it should be borne in mind that receiving a favourable report, for example, from a self-regulatory body may not be considered binding if the matter goes to court.

The ultimate responsibility for the truthfulness of advertising claims lies with the advertiser.

If you need to consult the consumer authorities you can contact the Ministry of Social Rights, Consumption and 2030 Agenda ([www.consumo.gob.es](http://www.consumo.gob.es)) and the regional consumer administrations (you can consult them at the following link): [https:// consumo.gob.es/es/consumo/autoridades-vigilancia-del-mercado-consumo](https://consumo.gob.es/es/consumo/autoridades-vigilancia-del-mercado-consumo)



## 9. For further information

If what we have presented in this guide is not enough for you and you immerse yourself further in the subject, below you will find a series of sources and links that expand on what we have said.

- » Ministry of Social Rights, Consumer Affairs and 2030 Agenda: <https://www.consumo.gob.es>.
- » SELF-MONITORING: <https://www.autocontrol.es/>
- » Law 3/1991 of 10 January 1991 on Unfair Competition: [www.boe.es/eli/es/l/1991/01/10/3/con](http://www.boe.es/eli/es/l/1991/01/10/3/con)
- » Royal Legislative Decree 1/2007, of 16 November, approving the revised text of the General Law for the Defence of Consumers and Users and other complementary laws: <https://www.boe.es/eli/es/rdlg/2007/11/16/1/con>

If you would like to follow the development of the proposals for Directives on both empowerment and environmental claims, you can do so through the European legislation platform Eur-Lex and using its search engine: <https://eur-lex.europa.eu/homepage.html>.





## 10. Bibliography

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# Annex I.

## Solutions to the Practical Exercises

### How do I say that? (solutions)

The sentences below are the correct environmental claims in each case.

**Potatoes:** We use organic farming techniques. (Correct use of guideline I).

The rest of the sentences fail to comply with several guidelines. Comparisons are made without studies to back them up, general concepts are used (green potatoes) and the images used do not provide relevant information and attempt to attribute to the product benefits it may not have.

**Detergent:** 40% recyclable packaging. (Correct use of Guidelines I and II).

In the others, irrelevant information is presented in the purchasing process (the amount of bicarbonate) and with a quantity that is not remarkable, as well as comparisons that are not very demonstrable and with the use of unverifiable studies. Future plans are unsubstantiated (they should be explained or more information should be provided and be seen to be feasible).

**Textile sector:** Jacket made from 100% organic material. (Correct use of Guidelines I and II).

As in the previous examples, there are poor comparisons and general concepts. What's more, in this case, the percentage of toxic substances can be confusing. Although this is an exact figure, the amount is so small in proportion that it is not particularly remarkable and therefore not relevant.

**Single-use plastic bottle with biodegradable lid:** There is a QR showing the life cycle impact of the bottle. (Correct use of guideline VI).

Generalised statements are used and saying "twice as many recycled materials" implies that there is a big change in product design, when in reality the change is minimal. The term biodegradable cannot be used if the technical characteristics of biodegradability are not met (and it is



only the lid) nor is it clarified under which conditions it is biodegradable. It also makes inappropriate comparisons.

**Banking sector:** Our offices are now equipped with solar panels. (Correct use of guideline I).

The environmental impact of sectors such as banking is focused on the energy consumption of offices, so it could be a good statement (although not as impactful as a change in the investment portfolio), the others repeat a bit of what we have seen in the previous cases.

**Plastic rubbish bag:** Displays the environmental impact of the product on the website, in English. (Correct use of guidelines II, III and VI).

The name of the company can already cause confusion, conveying the idea that we are dealing with another type of material that is not plastic. The term "recyclable" is generalised, ideally the percentage should be qualified. It should be ensured that the origin of the plastics is 100% from the "ocean" (which is somewhat dubious due to the manufacturing process of the product itself).

**Bioplastic toy:** With toys like this we have reduced the presence of plastics in our figure manufacturing processes by 5% by 2023. (Correct use of Guidelines I and II).

The name of the figure may cause confusion, as it is not a recyclable toy. What's more, it is not plastic-free, as it is a plastic product, even if it does not come from fossil fuels.

**Wooden table:** FSC Mix certified. (Correct use of guideline IX).

There are no woods that do not rot, ultimately they all do sooner or later, although there are some that are so resistant that it may seem that they are. General claims are used and it is not explained how the wood is actually grown and whether it is really the "best way" (an FSC mix certificate implies that not all the wood is from certified forests). Using the colour green intensifies the feeling of a low environmental impact product when it may in fact have a greater impact.

**Paper napkins:** Compostable in a home composter in 4 months, see our website for more information. (Correct use of Guidelines I, II, III and IV).

The comparison is inappropriate and the use of paper napkins does not clean nature; the use of reusable napkins is more appropriate.

**Jewellery:** This product contains 80% recycled gold. (Correct use of guidelines I and II).

The jewellery production process is polluting, so it is not possible to make such a generic statement, and jewellery boxes are not a relevant source of impact if we take into account the whole life cycle of the product, so even if the data is correct, it does not provide relevant information.

## ***Complete the ad (solutions)***

### **Agricultural company:**

We are more sustainable than ever before. We reduced our water consumption by 30% in 2023. (Correct use of Guidelines I, II and IV).

### **Stock exchange:**

Bags now have a lower environmental impact. This bag is compostable at a minimum temperature of 50°C. (Correct use of guidelines I and II).

### **Aerosol:**

It's important to take care of our planet. This aerosol has 7% less toxic ingredients than our previous model. (Correct use of guidelines I, II and V).

### **Washing machine:**

We've improved our energy efficiency. This washing machine consumes 20% less energy with the "eco" mode activated. (Correct use of guidelines I and II).

This washing machine consumes around 220 kWh per year with regular use and a 30°C programme, according to third party studies which you can read here. (Correct use of guidelines I, II and Vi).

### **Eggs:**

Quality eggs. Free-range organic fed hens (eggs are numbered 0). (Correct use of Guidelines I, II and IX).

### **Curtains:**

All our curtains are made from 30% recycled plastic. (Correct use of guidelines I and II).

All our curtains are made from materials whose transport (by our suppliers) is 50% electric. (Correct use of Guidelines I, II and IV).

**Bags:**

This bag is made from 25% recycled plastic. (Correct use of Guidelines I and II).

This bag is designed by a company that is phasing out single-use plastics (includes a link to more information explaining the whole process and what has been done so far). (Correct use of Guidelines I, II, IV and VII).

**Airline:**

We are proud to be a company that is starting to apply electric and hybrid technology in its operations, having replaced part of our diesel pushback with new electric models.

We are proud to be a company that communicates its environmental impacts publicly (access to studies). (Correct use of guidelines I, II, III, IV, VI and VII).

**Cosmetics:**

New oxybenzone-free sunscreen. (This substance is legal in Spain, however its use affects marine life. Correct use of Guidelines I, II and VIII).





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