

PRCA COMMUNICATIONS GUIDELINES

ON ENVIRONMENTAL SUSTAINABILITY CLAIMS

2023







Introduction

The PRCA APAC Sustainability Working Group has developed industry guidelines to support communications around sustainability, in recognition of the importance of well-informed and balanced public discourse in shaping a more sustainable future.

As communication professionals we have a role to play in helping businesses stay true and committed to the environmental claims they make about products, services, brands and activities. These principles are aimed at contextualising environmental claims while keeping broader sustainability ambitions in mind. Environmental claims of any nature — products, business or personal — must be framed with the fundamental concept of sustainability in mind: Nature's resources are finite and they must be used without compromising the needs of future generations.

This document provides a clear set of guiding principles for professionals that are communicating the sustainability actions of the businesses they represent, while helping brands ensure that their environmental claims are credible and trusted.









PRINCIPLE#1 - MAKE ACCURATE, SCIENCE-BACKED AND SUBSTANTIATED **STATEMENTS**

Communication professionals should avoid any statements or visual treatments likely to mislead audiences in any way about the environmental aspects or advantages of products, or about actions taken by a company. Environmental information must not state or imply claims that are factually incorrect, nor should they overstate or exaggerate

Best Practice

- State claims that are backed up by reliable and credible third-party data or research conducted by the company.
- Substantiations should be easily available, searchable and understandable to consumers
- When requested to promote a product or a service linked to sustainability, ask if the business can back up its claims.

Examples

- Promoting 'recyclable' products without specifying if this relates to the whole product or just the packaging. If a recyclable claim solely relates to the packaging (a minor element of the product) and the remainder of the product is not recyclable, the claim is likely to mislead the audience into thinking that the whole product can be recycled.
- Overstating environmental attributes, such as highlighting a marginal improvement as a major gain, or use of statistics in a misleading way ("we have doubled the recycled content of our product" when there was only a small percentage to begin with).
- Using misleading imagery that potentially misleads consumers on the environmental or sustainability attributes of advertised products or services.

PRINCIPLE#2 - BE SPECIFIC ABOUT TERMINOLOGY USED

General environmental claims should either be qualified or avoided. Claims such as "environmentally friendly," "ecologically safe," "green," "sustainable," "carbon friendly," "science-based" or any other claim implying that a product or an activity has no impact or only a positive impact, should come with a high standard of proof.

Best Practice

- Where feasible, choose to use technical language or terms that are backed by reliable scientific
- When describing the life cycle strategies of products, terms such as "recyclable," "biodegradable/ bio-based" or "ocean plastic" should be contextualised for users and substantiated.
- The communication of net-zero or carbon neutral claims should be substantiated with clear communications on the methodology and accounting metrics used.

Examples

• The term "eco-friendly" conveys far reaching environmental benefits, which because of their broad nature, and difficulty to substantiate, can be misleading. A claim, such as "Eco-friendly: made with recycled materials," would not be deceptive if: (1) The statement "made with recycled materials" is clear and prominent; (2) the marketer can substantiate that the entire product or package, excluding minor, incidental components, is made from recycled material; (3) making the product with recycled materials makes the product more environmentally beneficial overall, and (4) its advertisement's context does not imply other deceptive claims.









PRINCIPLE#3 - CONSIDER THE CONTEXT OF **A CLAIM**

Share information about environmental progress in the context of the whole company or the whole life cycle of the product. Communications that refer to specific products or activities should not imply, without appropriate substantiation, that they extend to the whole performance of a company, group or industry. It should be clear to what the claim relates, e.g. the product, a specific ingredient of the product, or its packaging or a specific ingredient of the packaging. Where time or space is limited, communications professionals must use alternative means to make qualifying information readily accessible to the audience.

Best Practice

Ask if a product or a service can back up its claims. Seek more information from stakeholders about measures taken to establish the veracity of aclaim, for example through conducting a life cycle analysis, product carbon footprinting or emission measurement. Recommend for such analyses to be conducted if needed.

Examples

- For many products, services, brands and businesses, the impact on the environment can be affected by things like sourcing of materials, production processes, packaging, transportation or disposal of products.
- A statement such as "we are lowering our carbon footprint by becoming more energy efficient" may convey that decarbonisation targets are met by energy efficiency without acknowledging wider efforts to measure and reduce other emission scopes across a company's operations and supply chain.

PRINCIPLE#4 - DEMONSTRATE INCREMENTAL **IMPACT**

A pre-existing but previously undisclosed aspect should not be presented as new. Environmental claims should be up to date and should, where appropriate, be reassessed with regard to relevant developments. As long as there are no definitive, generally accepted methods for measuring sustainability or confirming its accomplishment, no claim to have achieved it should be made.

Any comparative claim should be specific and the basis for the comparison should be clear. Environmental claims should not be based on the absence of a component, ingredient, feature or impact that has never been associated with the product category concerned. Conversely, generic features or ingredients common to all or most products in the category concerned should not be presented as if they were a unique or remarkable characteristic. Environmental superiority over competitors should be claimed only when a significant advantage can be demonstrated. Products being compared should meet the same needs and be intended for the same purpose.

Best Practice

- Check if a claim is specific enough and its basis of comparison is clear. Environmental claims should not be based on the absence of a component, ingredient, feature or impact that has never been associated with the product category concerned. Conversely, generic features or ingredients common to all or most products in the category concerned should not be presented as if they were a unique or remarkable characteristic.
- Check competitors' messaging. Environmental superiority should only be claimed when a significant advantage can be demonstrated. Products being compared should meet the same needs and be intended for the same purpose.

Examples

- A clothing manufacturer wants to promote its new line of Jeans as 'organic.' In fact, the new line uses the standard amount of 35% organic cotton that was already used in previous lines, which misleads customers into thinking that this is an incremental change. The company could promote the presence of cotton but it should state clearly its percentage (35%), list the other materials present and avoid positioning the line as new based only on the organic aspect.
- Claiming an existing line of plastic shoes as "vegan" when it is a label of convenience rather than one of incremental or thoughtful change.
- A statement such as "The world's most sustainable cleaning solution" is an absolute claim. Making one requires a robust substantiation to prove that the company's practices are more environmentally friendly than any other cleaning company in the market. This is independent of the fact that the brand may have implemented a range of sustainability-oriented practices and solutions.







PRINCIPLE#5 - COMMUNICATE WITH **TRANSPARENCY**

Craft communications campaigns, materials or information that balance the potentially positive as well as negative environmental aspects of a product, service, brand or business. This is especially important if a claim relates only to a relatively minor aspect of a product or activities by a business. Cherry-picking information or spotlighting a certain segment of a business misleads audiences to think that a product, service, brand or business as a whole is greener than it really is.

Best Practice

- Work with stakeholders to advocate for a balanced and transparent approach to communications around sustainability claims or progress, which will better protect brand or business reputation over the long run.
- When developing campaigns or materials to highlight a new sustainability initiative, include links to more information about broader sustainability efforts and progress in similar areas.

Examples

Launching a new campaign for a product with the claim "Nature's friend – better for the environment" may give the overall impression that the product and the packaging are better for the environment, when the brand might have a track record of using non-recyclable plastic which has a negative environmental impact. The omission of the information about measures taken to reduce packaging waste misleads customers.

Adoption of Guidelines

For these quidelines to be an effective industry tool, companies and/or individuals who follow these guidelines must demonstrate intent to implement these guidelines, reflected as follows:

- I. Incorporate guidelines into company policies, standards and processes.
- II. Report on actions taken in view of these guidelines to the PRCA periodically, which could include staff trainings, and the sharing of industry best practices and know-how.

References:

- Australia Environmental Claims Code (AANA)
- Singapore Code of Advertising Practice (SCAP)
- **EU Green Claims Directive**
- **International Chamber of Commerce Marketing and Advertising code**
- UK Green Claims Code

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