# Environmental Claims Summary of the Green Guides

## **General Environmental Benefit Claims**

- Marketers should not make broad, unqualiked general environmental benekt claims like ÷greenø or ÷eco-friendl{.ø Broad claims are difkcult to substantiate, if not impossible.
- Marketers should qualif{ general claims with speciŁc environmental beneŁts. QualiŁcations for an{ claim should be clear, prominent, and speciŁc.
  - When a marketer qualikes a general claim with a specike benekt, consumers understand the benekt to be signikeant. As a result, marketers shouldnøt highlight small or unimportant benekts.
  - If a qualiked general claim conve{s that a product has an overall environmental benekt because of a specikc attribute, marketers should anal{ |e the trade-offs resulting from the attribute to prove the claim.

Claiming "Green, made with recycled content" may be deceptive if the environmental costs of using recycled content outweigh the environmental benefits of using it.

### **Carbon Offsets**

- Marketers should have competent and reliable scientiŁc evidence to support carbon offset claims. The{ should use appropriate accounting methods to ensure the{ measure emission reductions properl{ and donøt sell them more than once.
- Marketers should disclose whether the offset purchase pa{s for emission reductions that wonøt occur for at least two {ears.
- Marketers should not advertise a carbon offset if the law alread{ requires the activit{ that is the basis of the offset.

## **Certifications and Seals of Approval**

- CertiŁcations and seals ma{ be endorsements. According to the FTCøs Endorsement Guides:
  - Marketers should disclose an{ material connections to the certif{ing or
  - Marketers shouldnøt use environmental certiŁcations or seals that donøt clearl{ conve{ the basis for the certiŁcation, because the seals or certiŁcations are likel{ to conve{ general environmental beneŁts.
  - To prevent deception, marketers using seals or certiŁcations that donøt conve{ the basis for the certiŁcation should identif{, clearl{ and prominentl{, speciŁc environmental beneŁts.

- Marketers can qualif{ certiŁcations based on attributes that are too numerous to disclose b{ sa{ing, õVirtuall{ all products impact the environment. For details on which attributes we evaluated, go to [a website that discusses this product].ö The marketer should make sure that the website provides the referenced information, and that the information is truthful and accurate.
- A marketer with a third-part{ certiŁcation still must substantiate all e press and implied claims.

#### Compostable

- Marketers who claim a product is compostable need competent and reliable scientiŁc evidence that all materials in the product or package will break down into ô or become part of ô usable compost safel{ and in about the same time as the materials with which it is composted.
- Marketers should qualif{ compostable claims if the product canøt be composted at home safel{ or in a timel{ wa{. Marketers also should qualif{ a claim that a product can be composted in a municipal or institutional facilit{ if the facilities arenøt available to a substantial majorit{ of consumers.

#### Degradable

• Marketers ma{ make an unqualiŁed degradable claim onl{ if the{ can prove that the õentire product or package will completel{ break down and return to nature within a reasonabl{ short period of time after customar{ disposal.ö The õreasonabl{ short period of timeö for complete decomposition of solid waste products? One {ear.

Non-Toxic		
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#### Made with Renewable Energy

- Marketers shouldnøt make unqualiŁed renewable energ{ claims based on energ{ derived from fossil fuels unless the{ purchase renewable energ{ certiŁcates (RECs) to match the energ{ use.
- UnqualiŁed renewable energ{ claims ma{ impl{ that a product is made with rec{cled content or renewable materials. One wa{ to minimi | e the risk of misunderstanding is to specif{ the source of renewable energ{ clearl{ and prominentl{ (sa{, ÷windø or ÷solar energ{ø).
- Marketers should not make an unqualiked õmade with renewable energ{ö claim unless all, or virtuall{ all, the signikcant manufacturing processes involved in making the product or package are powered with renewable energ{ or non-renewable energ{, matched b{ RECs.
- Marketers who generate renewable energ{ ó sa{, b{ using solar panels ó but sell RECs for all the renewable energ{ the{ generate shouldnøt claim the{ õuseö renewable energ{. Using the term õhostingö would be deceptive in this circumstance.

## Made with Renewable Materials

- UnqualiŁed claims about renewable material ma{ impl{ that a product is rec{clable, made with rec{cled content, or biodegradable. One wa{ to minimi | e that risk is to identif{ the material used clearl{ and prominentl{, and e plain wh{ it is renewable.
- Marketers should qualif{ renewable materials claims unless an item is made entirel{ with renewable materials, e cept