

Guidelines → ○ ○
for Credible, Science-driven
Environmental ▮ ▮ ▮ ▮
Footprint Claims

Redefining the **rules of business**



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About Quantis



Quantis is a leading environmental sustainability consultancy pioneering approaches to solve critical environmental challenges. For nearly two decades, our dynamic and visionary team has partnered with organizations across the globe to transform their industries and pave the way for a planetary economy that aligns business with nature. We are agents of change, helping companies transform from business as usual to business at its best.

At Quantis, we believe that sustainable transformation is possible and within our collective power. We contribute to this transformation by combining the latest environmental science with strategic business knowledge to advise global leaders on how to reduce their environmental impacts, engage with stakeholders to implement change, build resilience and successfully operate within planetary boundaries.

Motivated by this common purpose, our team of talented professionals cultivates a collaborative culture that we call the Quantis Spirit. We are innovative. We are impact-oriented. We are science-driven. **We are Quantis**

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About this report

This guidance provides a framework and principles for making environmental footprint claims and includes practical recommendations to avoid greenwashing. It is intended for all businesses, most notably their sustainability and marketing teams.

This guidance includes general best practice when making environmental claims, and recommendations to make claims that are specific, measurable, relevant, understandable and accessible.

The contents of this guidance are subject to change, in the case where new regulations or global standards come into effect and impact the relevance of its advice. This guidance has been prepared in accordance with ISO

Standards, national or regional guidelines and regulations, and other international guidance documents.

All information, recommendations and principles reflect Quantis' interest in establishing a coherent framework for businesses to better inform and engage consumers and other stakeholders towards a sustainable transition. This guidance is not legally binding and is not intended as a substitute for legal advice.

1

Introduction and overview **of key principles**

Intro

In line with an increased awareness from consumers of environmental considerations and a growing number of environment-related regulations over the last decades, the use of environmental claims for advertising purposes has become common practice.

In this context, environmental claims are assertions about the positive environmental profile of goods and services. Claims can relate to the way products or components of products are produced, packaged, distributed, used, consumed and/or disposed, and the different environmental impacts they might generate as a result of these processes in relation to climate, biodiversity, water, land use, social issues and

more. A variety of channels, such as on-pack, advertising material, point-of-sale, website and social media are used to communicate these claims.

Environmental claims should insulate consumers from misleading information, greenwashing and unfair competition, and help them make environmentally favorable choices. This means claims need to be truthful and accurate as a bare minimum, and at best, lead to a shift in consumer behavior.

Misleading claims and "greenwashing" are declarations about products, services, processes and brands or their operations, that communicate, either directly or by way of omission, the impression that a product or service is either less harmful or better for the environment than it is. Misleading or incorrect

claims can have severe consequences for brands, including tarnishing brand reputation¹, facing legal and liability actions,² losing consumer trust³ and risking investment and investor relationships.⁴

The purpose of this guidance is to help businesses understand and comply with existing standards and regulations when making environmental claims. It aims to support brands in adopting a transparent, science-based and greenwashing-free approach when making environmental claims in their brand or product communications.

While this guidance is designed to help businesses align claims towards best practice, it is not legal or compliance advice.



Misleading claims and "greenwashing" are declarations about products, services, processes and brands or their operations, that communicate, either directly or by way of omission, the impression that a product or service is either less harmful or better for the environment than it is.

Who should use this guidance

This guidance is for all businesses, particularly their sustainability and marketing teams, who deploy business-to-consumer (B2C) environmental claims in their product and brand communications. Such claims may be disseminated by manufacturers, wholesalers, distributors or retailers.

This guidance also applies to business-to-business (B2B) marketing and communications.

Although the legal framework regulating B2B marketing is less comprehensive and extensive than for B2C commercial practices, misleading advertising and misleading comparative advertising is still prohibited in some countries.

By applying the same high standards to both B2B and B2C communications, companies can create trust and transparency and mitigate the risk of harm to consumers and other stakeholders.

Guidance Framework

This claims guidance outlines Quantis' principles and suggested best practice. It also provides a detailed review of self-declared claims (ISO 14021) with a focus on science-driven claims made based on quantitative information.

The principles of this guidance are based primarily on the **United Nations (UN) Guidelines for Credible Sustainability Communication** and the ISO 14020 family from **The International Organization for Standardization (ISO)**.

UN Guidelines

In 2017, **the UN Environment Program** and the **International Trade Center** published Guidelines for Providing Product Sustainability Information. This publication was an output of the Consumer Information Program of the One Planet network, which is co-led by **Consumers International** and the German and Indonesian Environmental Ministries. This work established guidance on making effective, trustworthy claims on product-related sustainability information, defining five fundamental and five aspirational principles.⁵

UN Fundamental Principles for an effective trustworthy sustainability claim

-  Reliability
-  Transparency
-  Relevance
-  Accessibility
-  Clarity

ISO

In parallel, the ISO 14020 family covers three types of labeling and declaration schemes:

→ **Type I (ISO 14024)**¹ are eco-labels developed and certified by a third party, either a governmental or private organization, which allows the use of their environmental label for products meeting a set of predetermined requirements.

→ **Type II (ISO 14021)**² are self-declaration labels or written claims developed directly by the product or service producer without a third-party certification.

→ **Type III (ISO 14025)** are environmental declarations based on quantified and independently verified life cycle product information and enable comparisons between products of the same product category fulfilling the same function.

In addition, the ISO 14026 includes the principles, requirements and guidelines for specific communication of footprint information to communicate valid, science-based and comparable information and prevent and avoid greenwashing.

Quantis Principles

Building on the UN and ISO standards and guidelines, as well as other national and local guidelines and legislations, Quantis has developed a set of five principles based on our expertise and knowledge of environmental communications and Life Cycle Assessment (LCA). These principles are intended to go beyond existing guidelines and provide thought leadership on the topic of environmental communications.

Environmental claims should be made ONLY in the case where:

→ **The product is not part of a particularly polluting sector.**

For example, a petroleum-based gasoline should not claim that it is good or better for the environment in view of a minor change in its production.

→ **The environmental benefit of the product is not the result of industrial activities that are intrinsically harmful** to the environment and society.

For example, a bottom trawling fishing company claiming a lower environmental impact given its shift to recycled nets or a fruit

producing company claiming a lower environmental footprint for their products by eliminating the packaging. In the case of the latter, needing to spray the produce with a chemical wax that has a higher environmental footprint than the original packaging and might be harmful for human health negates any possible benefit of the practice for the environment.

The following principles and recommendations set a strict, transparent and science-based approach for companies willing to communicate about the environmental footprint of their products.

Environmental Communication types according to ISO









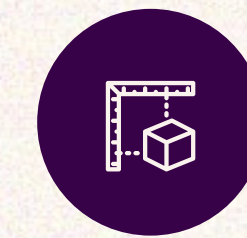
	Type I 	Type II 	Type III 
Format	Eco-Label	Self-Declaration	Environmental Declaration Eco-Profile
Objective	Promote the best products in a given category	Communicate environmental claims with written statements or self-made labels (not recommended)	Compare all products of market segment in a standard format
Standard	ISO 14024	ISO 14021 and 14026 for environmental footprint claims	ISO 14025 and ISO 14027 for carbon footprint
Comparability	Low	Limited and not standardized	Product/Sector comparability (Product Category Rules)
Verification	Third-party certification (limited in time)	Not independently certified Should be verifiable and transparent	Verified
LCA Life Cycle Analysis	Needed in some cases. E.g., some carbon footprint labels	Optional, but recommended to substantiate claim	Mandatory
Example	  	To be developed by brands or companies	 

Figure 1. Types of environmental claims and communications according to ISO

Quantis' Five Principles for **Clear, Credible + Transparent Claims**



Specific



Measurable



Relevant

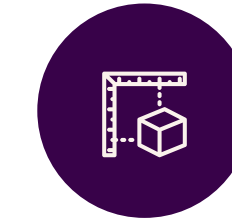


Understandable



Accessible

Environmental claims should be **Specific**



→ **Be clear**, truthful, complete and accurate to help consumers make informed choices. Avoid giving an inaccurate impression, using vague, broad or ambiguous terms. Terms like "green," "sustainable," or "eco-friendly," especially if used without substantiation, should be avoided. These terms are imprecise and suggest products or brands have a positive environmental impact, which is at best, very hard to prove, and at worst, not true.

→ **Do not overstate** or exaggerate the positive environmental aspect or impact of a product, service, process or brand.

→ **Communicate about the impact** of activities on specific environmental aspects, such as the air, water, soil, ecosystems, biodiversity or climate, rather than in generalized terms.

Environmental claims should be **Measurable**



→ **Substantiate claims with verified and well-accepted scientific methods such as LCA.** Keep information and figures up to date.

→ **State the limits/parameters/assumptions** of the study, unit of measure and products assessed.

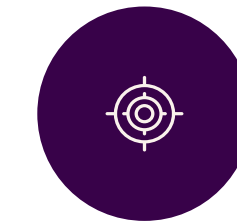
→ **Help consumers** make more sustainable choices with constructive comparability.

→ **Provide evidence** that your claim is factual and correct.

→ **Use and comply** with well-recognized international standards such as ISO or PEF.

→ Where possible, **have independent organizations verify any claims** to increase consumers trust.

Environmental claims should be **Relevant**



→ **Avoid misleading information**, such as highlighting the absence of an ingredient that was never present, the benefit a product has always held or held previously, an environmental benefit required by law, or a benefit much less relevant than a bigger issue at hand.

→ **Avoid cherry-picking positive impacts and omitting or hiding relevant and important information.** Claims should not focus on the positive environmental aspects of a product,

service, process or brand, where other aspects have a negative impact and consumers could be misled.

→ **Compare goods or services in a fair and meaningful way** to ensure the comparison will not lead consumers into misunderstanding the sustainability aspects of products.

Environmental claims should be **Understandable**



→ **State the limits/scope of the claim** and make clear whether the claim is about the entire product, a specific product component, or its packaging.

→ **Use equivalencies** to contextualize data and to make it more understandable.

→ **Do not use jargon** and be mindful of the language used to make sure the audience will understand. Explain in a clear and straightforward manner the basis for the claim.

→ **For comparative sustainability claims,** phrase the claim as clearly as possible to prevent any confusion among consumers. Comparative claims can ONLY be made for products that satisfy similar needs or that are meant for similar purposes in the same market.

→ **When using: third-party labels,** it must be clear what the label stands for, and on what basis the label has been awarded.

Environmental claims should be **Accessible**



→ **Ensure the substantiating evidence** for the claim is sufficient, visible, accessible and free of charge.

→ **Provide additional information** in other channels that are easily accessible to complement and substantiate the claim if necessary (e.g., a QR code linking to a website).

→ **Publish and link to claim** assessment methods and sources.

2

Types of **environmental claims**

There are several types of environmental claims relating to different product characteristics, including the type of raw materials, sourcing, eco-design, recyclability and environmental footprint.

Product features that can merit an environmental claim include:



Not all the aforementioned environmental claims require a Life Cycle Assessment be conducted before communicating as such, according to ISO and other national guidelines. However, to ensure that claims are relevant and have an environmental benefit, Quantis recommends:

+ **Communicating product characteristics** that can be backed up with science-based evidence.

+ **Ensuring changes and redesigns of products, production processes or value chains do not result in a transfer of impacts.** (e.g., reduction of carbon footprint but an increase in water consumption, use of renewable materials but an overall increase in carbon footprint).

+ **Only communicating improvements** to previous version of the product if the measure of the improvement is 10% or greater, as recommended by critical reviewers or LCA experts.

+ **Ensuring savings or reductions are higher** than the uncertainties or margins of error usually encountered for any given calculation.

Environmental footprint claims with **quantitative information**

Environmental footprint claims that are science-driven can act as a proof point of a company's environmental sustainability efforts. Making this type of claim as a stand-alone piece of information and without context can, however, be confusing and misleading to consumers or other stakeholders. Furthermore, should such claims lack relevance or significance and miss the point of the company's sustainability objectives, it risks additional harm to brand perception. Quantis recommends *always* tying science-driven environmental claims to the company's environmental sustainability plan or strategy to demonstrate consistency in the brand's sustainability journey. This can be an

essential component when it comes to retaining customers and building both loyalty and trust in the brand and its sustainability credentials.

Environmental footprint claims include information about the environmental impacts of products, services or brands across their life cycle. A science-based study is needed to make this type of claim, such as an LCA, plastic leakage assessment or a water footprint.

When performing a product LCA for communication purposes, being thoughtful about the objective of the communication, the target audience and the key message the company wants to transmit, is crucial to the integrity of such communications.



Quantis recommends *always* tying science-driven environmental claims to the company's environmental sustainability strategy to demonstrate consistency in the brand's sustainability journey.

The nature of the claim, alongside where and how it will be used, will also impact the LCA requirements to substantiate it.

For instance, comparative claims against competitors' products or market averages require an ISO-compliant third party reviewed LCA, but declarative claims (claims about a company's own product) do not necessarily require such a level of scrutiny. Similarly, on-pack claims require a different degree of assessment than off-pack claims.

Addressing the following questions will identify how to perform a study to substantiate a given claim.

→ Which type of claim do we want to make? Do we want to compare our product against a previous version, another product in our portfolio, a competitor's product or the market average?

→ Do we want to communicate in different markets or focus the communications on one market?

→ How and where are we going to use the claim (i.e., which channels): on-pack, off-pack, website or on-shelf?

→ Regarding which environmental aspect do we want to communicate a claim (climate, water, soil, biodiversity)?

3

Making claims using **Life Cycle Assessment**

There are multiple common methods employed to measure the environmental performance of products and services to substantiate environmental footprint claims. Some examples include the ISO 14040¹ and ISO 14044², covering LCA standards and focused mainly on the process of performing the LCA, following a product's impact from cradle to grave. ISO 14040 describes the principles and framework for LCA, while the ISO 14044 specifies requirements and provides guidelines for LCA.

Similarly, the **European Commission** has developed a harmonized environmental footprint methodology to measure and communicate the environmental performance of products and organizations. The resulting methods are the Product Environmental

Footprint (PEF) and the Organization Environmental Footprint (OEF). These two methods cover 16 potential environmental impacts, including climate change, as well as impacts related to water, air, resources, land use and toxicity. These are the leading international standards of LCA and today's best-regarded approaches to substantiating environmental footprint claims.

Depending on the purpose of the LCA, different levels of compliance within the LCA method are possible (widely known as screening LCA). For communication purposes, these different approaches have benefits and constraints to consider.

Types of LCA: **screening LCA** **vs ISO/PEF compliant LCA**

While ISO-compliant and screening LCA terminology have been widely employed by both Quantis and other LCA practitioners in the market, there is no standardized definition of what each entails. The reality is that there is a margin of quality and detail when it comes to performing an LCA. This section provides some basic guidelines on how these two approaches differ from one another.

ISO-compliant LCA

An ISO-compliant LCA follows all the steps recommended by ISO Standards 14040 and 14044 and is grounded in a detailed LCA report. This report follows ISO recommendations in terms of structure, details the data and methodology used in the study, and the results obtained. Some key characteristics unique to ISO-compliant studies include:

- **A very detailed written report,**
- **LCA results covering a large panel of impact categories,**

→ **A data quality assessment,**

→ **An uncertainty analysis,**

→ **A sensitivity assessment** evaluating the impact of using different impact assessment methodologies (e.g., comparing results obtained with the PEF methodology to results obtained using ReCiPe 2016),

→ **A critical review by a third party verifying its compliance with ISO.** In the case of a comparative assessment, the critical review is conducted by a panel of at least three experts.

PEF compliant LCA

A Product Environmental Footprint (PEF) is an LCA methodology developed by the European Commission's Joint Research Center (JRC). PEF methodology intends to harmonize and standardize LCAs by identifying a single requirement for each decision point or providing additional guidance. This enables more consistent, robust and replicable studies.

Different rules are applied for assessments in different product categories (PEFCR). These are intended to ensure that the most important features in each product category are not ignored.

Some key characteristics of PEF-compliant studies in respect of communications include:

→ **Use of cradle-to-grave approach** (full life cycle),

→ **LCA results for a large panel of impact categories,**

→ **A data quality assessment,**

→ **A critical review of the results** by at least one independent and qualified external reviewer,

→ **A detailed report.**

Screening LCA

In contrast to ISO and PEF-compliant LCAs, screening LCAs are often perceived as less precise or robust. It should however be noted that the screening quality of an LCA is not necessarily tied to the quality of the data nor the calculations undertaken. Any LCA that is not supported by a detailed report structured according to ISO and PEF recommendations is often considered a screening LCA.

Generally speaking, in addition to the points highlighted above, some characteristics of screening LCAs include:

→ **The absence of a detailed report**, with results often presented in PowerPoint,

→ **Findings based on key assumptions** on particularly uncertain aspects of the life cycle (e.g., consumer behavior), with a lack of documentation or other support,

→ **The exclusion of certain data points** on the basis that they are "low impact" (e.g., packaging used to transport raw materials),

→ **Results presented across a limited number of impact categories**,

→ **Few, critical and sensitivity analyses performed.**

What to communicate in each situation

Screening LCA

Quantis recommends taking caution when using screening LCA results to make environmental claims. The wording and placement of the claim can impact its legitimacy and risk both a challenge to the claims, and negative consequences for the brand.

Limiting communications to the overall environmental impact of one product is often the most prudent approach when relying upon a screening LCA. However, if the claim compares the product to a previous version or to another product in the brand's portfolio, careful analysis and consideration about the wording of the claim is recommended.

For example, a claim about CO₂ emissions reduction between the previous and the newer version of a product due to a material reduction has lower chances of being challenged or scrutinized. However, a reduced environmental footprint of a product following a change of materials, for example a transition from fossil to bioplastic, depends on, among other things, the type of feedstock used and associated potential

land-use change risks. These results may engender a knock-on effect for other external parties (like material producers, providers, associations, or competitors). In the case of a claim that highlights an impact reduction due to a material change, data uncertainty, possible lack of robustness of the study, misinterpretation of results, or results not validated by experts, could very well call into question the legitimacy of such claims.

This situation could lead to competitors, industry associations, NGOs, suppliers or other external stakeholders to challenge the claim, increasing the risk of negative reputational and legal impacts.

Additionally, the absence of a third-party

LCA report or verification of results exposes a screening LCA to increased risk of a challenge.

Quantis recommends that any decision taken to communicate a claim based on the results of a screening LCA be made in consultation with an LCA expert, an environmental communications expert and the company's legal team, and on a case-by-case basis.

Another important aspect to consider before communicating following a screening LCA, is that this kind of assessment does not systematically include a multi-indicator approach, and is instead primarily focused on carbon alongside one or two other indicators. This limits communication about multiple indicators and fails to guarantee there is no shift of impacts.



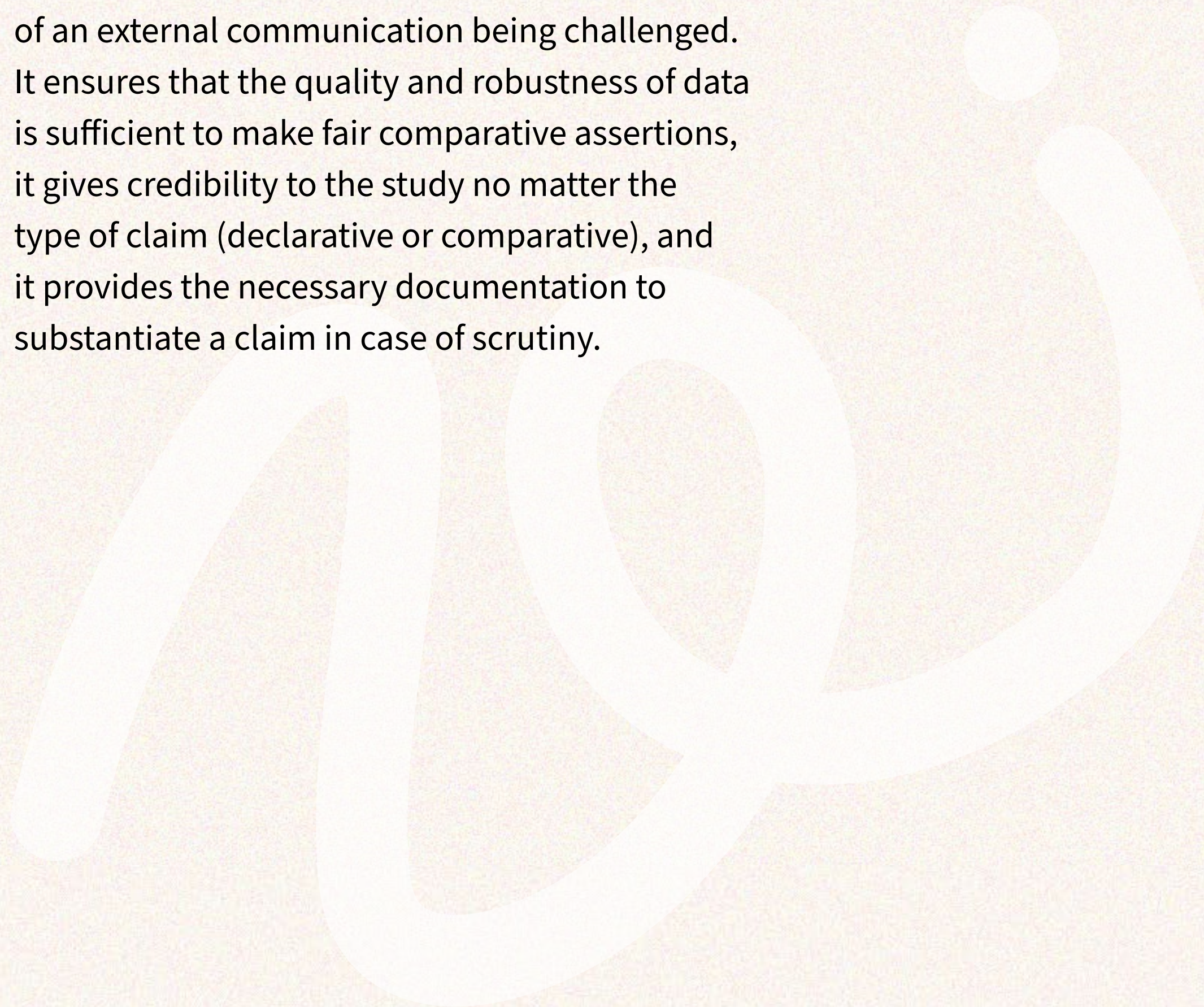
Screening LCAs do not systematically include a multi-indicator approach — they're primarily focused on carbon. This limits communication about multiple indicators and fails to guarantee that there is no shifting of impacts.

ISO-compliant LCA

According to ISO 14040, in order to limit possible misunderstandings or negative effects on external interested parties, a committee of interested parties should carry out critical reviews of LCAs when the results are intended to be used in support of a comparative statement for public disclosure. This means that comparative claims against a competitor's product or market average used for B2B and B2C communications require substantiation via an ISO-compliant, critically reviewed LCA.

In practice, a critical review delivered by experts with knowledge of the competing product or technology, is an instrument for reducing the risk

of an external communication being challenged. It ensures that the quality and robustness of data is sufficient to make fair comparative assertions, it gives credibility to the study no matter the type of claim (declarative or comparative), and it provides the necessary documentation to substantiate a claim in case of scrutiny.



External Communication

	Communicate a product's footprint across different indicators (declarative claims)	Communicate a product's footprint versus other products within the brand's portfolio across different indicators (comparative claims)	Communicate a product's footprint versus competitor products across different indicators (comparative claims)
<div><div></div>Single product screening LCA</div>	<div></div>	<div></div>	<div></div>
<div><div></div>Single product ISO-conformance LCA (non-critical reviewed) Not frequently used</div>	<div></div>	<div></div>	<div></div>
<div><div></div>Single product ISO-compliant LCA (critical reviewed)</div>	<div></div>	<div></div>	<div></div>
<div><div></div>Screening comparative LCA</div>	<div></div>	<div></div>	<div></div>
<div><div></div>Comparative ISO-compliant LCA (peer reviewed)</div>	<div></div>	<div></div>	<div></div>

Possible

Possible, depending on business context risks to be challenged and data uncertainties

Higher risks but possible, depending on business context, products compared, risks to be challenged and data uncertainties

Not possible

Single LCA

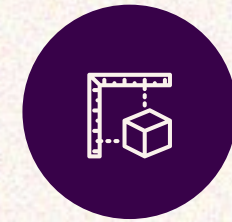
Comparative LCA

Figure 2. Types Of LCAs and Communications Using ISO Standards

4

Quantis principles applied to **environmental footprint claims**

Quantis has outlined recommendations for the application of each principle in making environmental footprint claims. Quantis recommends companies draft and substantiate the environmental footprint claims about their products or services by following these practical guidelines and recommendations.



Environmental claims should be **Specific**

1. Claims should clearly state:

- **The scope of the study** and the product(s) assessed
- **The geographies and markets evaluated**
- **Clarity about the degree** to which an entire product or a product component is implicated
- **The indicator(s) or impact(s) assessed**
- **The unit(s) of measurement** of the product(s)
- **The unit of measurement** of the indicator assessed

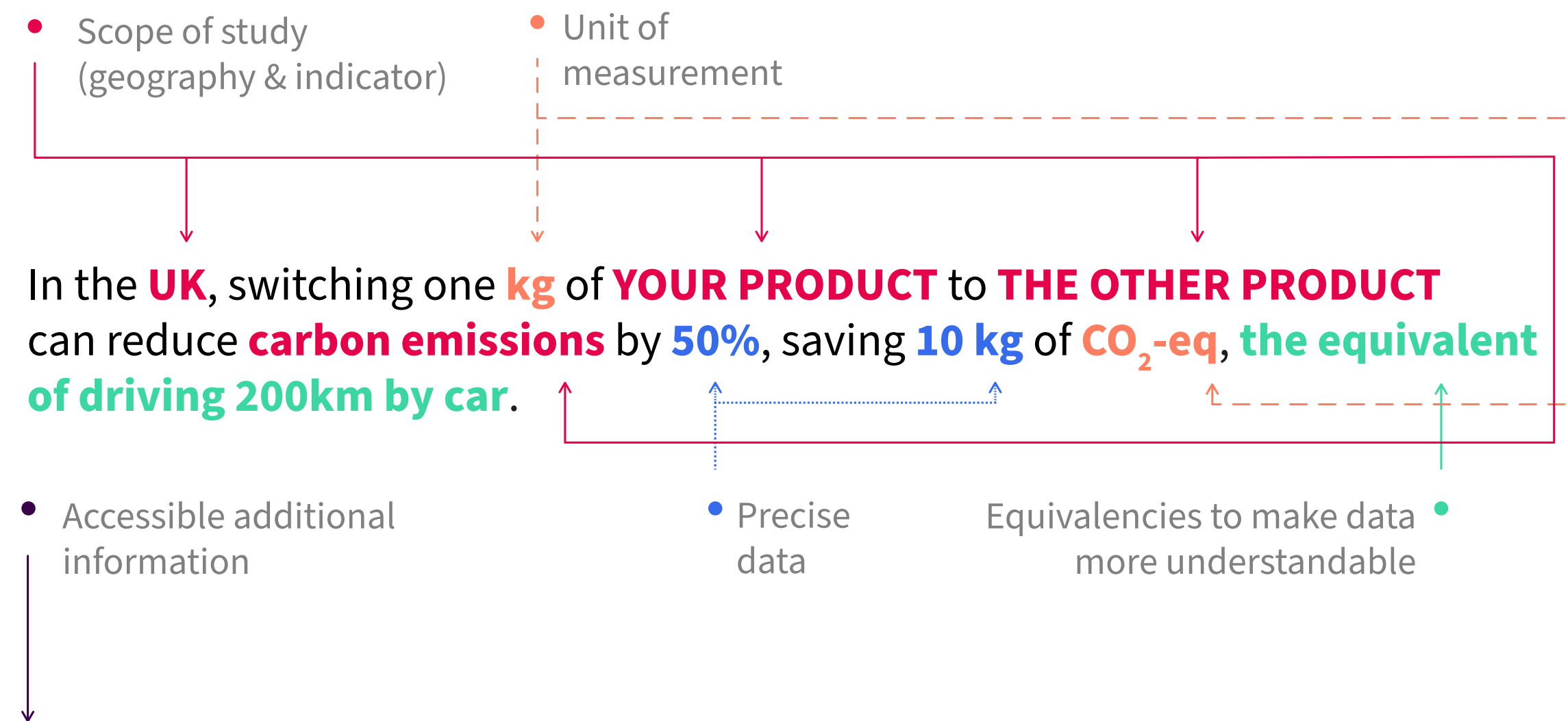
→ **Precise quantitative data** expressed in decimals or percentages. Percentages and fractions can also be used in comparative claims if precise results in decimals are made available via the study. For example, expressing the carbon footprint of a product whose impact is evaluated at 3.5 kg CO₂-eq, as "50% lower" or "half the impact" in a comparative claim, against a product whose footprint measures 7 kg CO₂-eq.

2. **Data expressed in percentages should be rounded conservatively** so that they are easy for the general public to understand, and to avoid over claiming (e.g., 53% savings rounded to 50%). Given approximations exist in any LCA, a conservative approach avoids misleading communications and greenwashing.

3. The use of equivalencies is recommended to put results into perspective and communicate impacts clearly. (e.g., switching one kg of product A to B can reduce XX kg of CO₂ emissions, equivalent to driving XX km by car).

4. When using equivalencies, internationally recognized conversion factors should be accompanied by a disclaimer which articulates any assumptions in arriving at an indicator (e.g., the type of car used in calculations) and the data sources (e.g., ecoinvent v3.7.1)

Anatomy of a clear and transparent claim



Background of the study

Based on a ISO compliant LCA in 2021 by XX of YOUR PRODUCT compared to THE OTHER PRODUCT in the UK. The LCA study has been peer reviewed by an independant panel of three experts in conformity to the ISO 14040 and 14044 standards for public disclosure of results. A technical summary of the study including details of the basis of our comparative claims can be found here.

Figure 3. Anatomy of a clear and transparent claim. For a claim to be clear, transparent and credible, it should clearly state the scope of the study it is based on, include units of measurement and precise data, and provide equivalencies that help make the data more understandable. Providing additional information about the study the claim is based on can also enhance clarity and transparency.



Environmental claims should be **Measurable**

- 1. Environmental footprint claims should be based on an LCA study completed in accordance with well-recognized methodologies and international standards like PEF and ISO.**

These accounting approaches align in terms of methodological guidance, however there are some discrepancies which reduce the consistency and comparability of analytical outcomes. Quantis recommends following ISO

(e.g., ISO 14044, ISO 14046, ISO/TS 14067) and Product Category Rules (PCR). Where a PCR is used (see ISO 14025, 14027), the methodology or standard that is officially required by local authorities or that is locally accepted and recognized will suffice, e.g., GHG Protocol or PEF and PEFCR in Europe.

- 2. Claims should be worded in accordance with ISO 14021 and ISO 14026** and specific national guidelines.

- 3. Claims can be accompanied by third-party certifications and labels to guarantee the accuracy of the information and build trust**, as long as the information communicated to consumers via the label is trustworthy and robust, and provides clear information about the environmental attributes of the product.

- 4. ISO - Comparative claims** against another organization's products should be made only in the case where a single underlying comparative LCA, submitted for critical review in accordance with ISO/TS 14071, has been undertaken. The LCA should cover the assessment of all the products compared in the claim or using the footprint of products determined by different LCA studies that have undergone a critical review. Any additional LCA referred should meet the requirements of the same footprint communication program and follow the same PCR developed in accordance with ISO/TS 14027. The product footprints under comparison should be based on consistent assumptions and data sources, such as databases or published literature.

PEF - To communicate the results of PEF studies externally, even in the absence of comparison, the verification and validation process prescribed in the PEF method must be followed. Comparisons are only permitted if the study follows the relevant PEFCR and has been verified and validated.

5. Comparative claims should include all life cycle stages of all products compared.

6. Comparative claims should be made between products only where they employ the same functional unit, and are currently or recently available in the same market.

7. Generic data from reliable data sources can be used for LCA modeling when robust and relevant for the type of claim. For comparative claims, where the difference in impact is significant (higher than 10%), data uncertainty should not affect the robustness of the results. In this case, generic data can be sufficient. Quantis recommends using high-quality primary data when making comparative claims against competitors' products when differences between products are small and harder to prove, as primary data allows for more precise results. Secondary data should be employed when collection of primary data is not feasible, or the data is of low quality. Quantis

recommends consulting an LCA expert if primary data is recommended or required.

The PEF method follows a materiality approach, describing how to identify what is most relevant and focusing primary data collection efforts on these areas only. PEFCRs then provide specific data requirements, guiding primary data collection and articulating the assumptions and specific secondary data required.



Environmental claims should be **Relevant**

1. The use of equivalencies should be locally relevant. For example, equivalencies that depend on energy efficiency will differ based on the price of energy and the energy mix (nuclear, solar, coal) within a country. This means that standardized communication using equivalencies – for example on-pack – may not be relevant and accurate at an international level. Quantis recommends aligning equivalencies with the input of local and regional teams.

2. Product environmental claims should include the results of at least three indicators (e.g., carbon, water and land). The indicators should be the sustainability hotspots of the LCA results and those most relevant for the industry or product category. This ensures there is no significant shift of impacts across indicators.

3. The claim must not enhance one aspect where the product is performing well (or has improved) while masking other aspects where the product is performing poorly (or has deteriorated).

4. On-pack claims should express the LCA results of the specific product on the specific market where it is sold. Data from other markets or regions should not be used outside

their locality, nor should data be extrapolated. Additional assessment of specific markets should be undertaken when making specific on-pack product claims for carbon labeling.

5. If on-pack claims use regional rather than market-specific LCA values (not recommended) they should communicate figures that are representative for all countries and markets included in the region. Regional values should express the most conservative value of all markets assessed.

6. Projected reduction claims should be thoughtfully drafted. Extrapolation of time should be realistic and remain relevant and accurate. The functional unit in an LCA study is usually expressed on the basis of one year.

Claims that extrapolate results over a longer period to make impact reduction projections can be misleading and inaccurate. Many aspects of a company, the products assessed, the market or consumer behaviors may change beyond the period of a year, making assumptions less valid and misleading. Quantis does not recommend making claims like: "By switching from product A to B we could save XX tons of CO₂-eq emissions over a five-year period."

7. LCA studies do not have a precise validity period. Over time, aspects of the product, production processes, manufacturing sites, value chains and suppliers of the product can change. Further, LCA databases, methodologies and emission factors can be updated, rendering

the results of the LCA outdated. Quantis recommends consulting an LCA expert to determine whether results are up-to-date and relevant at the moment of communicating externally.

8. Claims based on assumptions of consumer behavior or behavioral change should be substantiated by behavioral studies, realistic figures and reliable sources. Unrealistic scenarios that do not match real consumer behavior can mislead consumers and be considered greenwashing. For example, claiming the benefits of a rechargeable product assuming 20 recharges during the lifetime of the product when, in reality, consumers only recharge it three times before disposal.

9. For product category comparative claims, Quantis recommends using the lowest savings value of all products assessed per indicator.

This is the most conservative approach and reduces the risk of over claiming. Average values might not be representative for certain products in the category and could result in misleading claims. Another approach is to use the sales-weighted average in the case where one of the products represents the majority of the portfolio (e.g., 80% oat milk, 10% almond and 10% rice). In this case, an explanation of the approach used should be included alongside the claim or in the further detail section which substantiates the claims.

10. Ensure that any impact reductions or environmental benefits are scientifically significant. Even when LCA results have values that appear positive, they cannot be used in external comparative claims without statistical verification. Quantis recommends consulting an LCA expert to determine if results are reliable and reflect a significant improvement warranting public communication.

11. Avoid cherry-picking information by communicating indicators or life cycle stages that overperform. Claims about specific life cycle stages or product components should be accompanied by sufficient context of the overall product footprint – such as the percentage of overall impact represented. For example, "By changing the material of our packaging from A to

B, we are reducing 50% of the carbon footprint of our box. The packaging represents 10% of the total carbon footprint of our product." Alternatively, "By changing the material of our packaging from A to B, we are reducing the climate impacts of our product by 5% and the impact of our packaging by 50%."

12. All stages of the life cycle should be considered in the LCA (e.g., raw material production, manufacturing, transport to market, consumption/use, disposal). If claims focus on a life cycle stage, they should clearly state the percentage of the overall impact of the product represented.



Environmental claims should be **Understandable**

1. The language used in claims should be easy for the general public to understand.
Avoid using technical and complicated jargon.

2. Claims should use factual, objective and neutral terms. If a subjective term is used (not recommended), such as "cleanest," "greenest" or "best," substantiation is essential.

3. Ensure that the selected equivalency is relevant to the environmental indicator it illustrates (e.g., the number of baths rather than the number of kilometers driven by a car, to illustrate water savings).

4. Claims should not be accompanied by imagery, icons or colors that can be deceptive or misleading.

5. Claims should clearly differentiate between product and brand information.

6. Avoid the creation of new and unverified environmental seals, logos or labels to communicate environmental features. These can lead consumers to mistakenly infer approval or verification by an independent third party.



Environmental claims should be **Accessible**

1. Environmental claims should be placed in a relevant and timely manner, accessible where consumers need them to make an informed decision.

2. Qualifying information must be readily available in close association with the claim. Sufficient, clear and trustworthy information should be available for consumers to make informed decisions.

3. Further information about the LCA results, and evidence to substantiate claims should be publicly available, easily accessible and free of charge.

4. Further explanation of the methodology, assumptions, limitations, uncertainties and sources of the LCA should be available on the company's website or other channels. Providing extended information using website links or QR codes or other prompts on-pack will bypass constraints and help consumers to make well-informed decisions.

5. Caveats, assumptions and limitations should be presented in readable typeface in a location near the claim.

6. A disclaimer that discloses how, and by whom, the sustainability claim was developed, and who provided the evidence behind the claim, should be displayed next to the claim.

7. For comparative claims, a publicly available substantiating document is required. An ISO-compliant LCA report can be used for this purpose, however it may contain sensitive information about the company, product and value chain. These reports are also long, technical and difficult for the general public to digest. Quantis recommends having a shorter summary of the LCA report with the key elements of the study shared publicly on the brand's website to promote transparency and make information accessible.

Notes

¹ Mongabay, "'Laundering Machine': Furniture Giant Ikea Implicated in Logging Protected Siberian Forests," Earth.org, <https://earth.org/ikea-implicated-in-logging-protected-siberian-forests/>

² Competition Bureau Canada, "Keurig Canada to pay \$3 million penalty to settle Competition Bureau's concerns over coffee pod recycling claims," January 6, 2022, <https://www.canada.ca/en/competition-bureau/news/2022/01/keurig-canada-to-pay-3-million-penalty-to-settle-competition-bureaus-concerns-over-coffee-pod-recycling-claims.html>

³ DW Planet A, "H&M and Zara: Can fast fashion be eco-friendly?" last modified January 8, 2021, video, 12:34, https://www.youtube.com/watch?v=00NIQgQE_d4

⁴ Aviva Investors, "Green is not always clean," Aviva Investors, last modified May 19, 2021, <https://www.avivainvestors.com/en-gb/views/aiq-investment-thinking/2021/05/greenwashing-risk/>

⁵ UNEP, Guidelines for Providing Product Sustainability Information (2017), accessed June 2022, <https://www.oneplanetnetwork.org/knowledge-centre/resources/guidelines-providing-product-sustainability-information>

Annex

International Organization for Standardization. Environmental management – life cycle assessment. ISO 14044:2006. Geneva: International Organization for Standardization, 2006. <https://www.iso.org/standard/38498.html>.

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Disclaimer

Quantis recommends companies seek legal advice and/or relevant industry association counsel to ensure claims and communications are relevant, clear, transparent and compliant with local requirements and legislation.

This document provides general guidance about what to consider when making environmental claims and is not intended as a substitute for legal advice, first-hand information of national

or region-specific requirements or compliance procedures for making environmental claims.

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