



Consumer
Information
PROGRAMME



Guidelines for Providing Product Sustainability Information

Global guidance on making effective environmental, social and economic claims, to empower and enable consumer choice



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ABOUT THE 10YFP CONSUMER INFORMATION PROGRAMME

This publication is an output of the Consumer Information Programme of the 10 Year Framework of Programmes on Sustainable Consumption and Production. The Programme is a global platform supporting the provision of quality information on goods and services, to engage and assist consumers in sustainable consumption. It implements and supports projects; undertakes research; shares good practice and policies; and provides collaboration opportunities. The Programme is led by the Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB), Germany; the Ministry of Environment and Forestry of Indonesia, and Consumers International; and brings together a network of public, private and third sector actors. More information, and ways to participate, can be found at www.oneplanetnetwork.org/consumer-information-scp.



Federal Ministry for the
Environment, Nature Conservation,
Building and Nuclear Safety



Ministry of Environment and Forestry
Republic of Indonesia



CONSUMERS
INTERNATIONAL

ACKNOWLEDGEMENTS

The Guidelines are the result of an international, multi-stakeholder process, led by UN Environment and the International Trade Centre through a working group of the UN's 10YFP Consumer Information Programme. Between June 2015 and October 2017, the working group comprised of experts and key stakeholders from all regions held seven webinars and a workshop to develop and co-draft the Guidelines in a consensus-based process. The members of the working group included:

Mark Barthel (3keel), Katrin Recke (AIM – European Brands Association), Valérie Séjourné, Sascha Nissen (A.I.S.E. - International Association for Soaps, Detergents and Maintenance Products), Gabriela Yamaguchi, Helio Mattar (Akatu Institute), James Fava (Anthesis Group), Hubert Vendeville (Betterfly Tourism), Richenel Trustfull, Albert Alleyne (Caribbean Consumer Council), Ariel Gustavo Carbajal (Centro Tecnológico para la Sustentabilidad), Kimera Henry Richard (Consumer Education Trust), Katja Wehbi (County Administrative Board of Östergötland, Sweden), Simon Johnson (Department for Environment, Food and Rural Affairs), Jiannis Kougoulis, Lana Žutelija, Peter Czaga (European Commission, Directorate-General for Environment), Stefan Sipka (European Policy Centre), Ulf Jaeckel (Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety, Germany), Bjørn-Erik Lønn (Global Ecolabelling Network), Jim Bracken, Stephan Schaller (Global Standards 1), Masahiko Hirao (Green Purchasing Network Japan), Alexandra Caterbow (HEJSupport), Raelene Martin, Ian Twinn (International Chamber of Commerce), Olga Speranskaya (International POP Elimination Network), Joshua Wickerham (ISEAL Alliance), Joseph Wozniak (International Trade Centre), Charles Duclaux (L'Oréal), Sylvain Chevassus (Ministry for Ecological and Solidary Transition, France), Shorouq Abu Taleb (Ministry of Environment, Jordan), Noer Adi Wardoyo (Ministry of Environment and Forestry, Indonesia), Feng Wang (Life Cycle Initiative), Ricardo Estrada (Ministerio del Ambiente Peru), Euan Murray (The Sustainability Consortium), Elisa Tonda (UN Environment), Claire Kneller (WRAP), Vriily Rondonuwu (Yayasan Pembangunan Berkelanjutan).

Further, the Guidelines benefitted from the feedback of over 90 stakeholders who participated in a global consultation (listed in Recognitions).

The Guidelines are a key output of the 10YFP Consumer Information Programme. At its annual meeting in February 2017, the Programme's Multi-stakeholder Advisory Committee accepted the Guidelines for publication and road testing. This does not imply an endorsement of the Guidelines by the institutions that form the Multi-stakeholder Advisory Committee, nor those of the working group responsible for the Guidelines' development.

The development of the Guidelines was managed by Bettina Heller (UN Environment), together with Regina Taimasova (International Trade Centre), and with support from Ian Fenn (Consumers International). The Guidelines were drafted by Jan Christian Polanía Giese (THEMA1). Barbara Hennecke (100 Prozent Erneuerbar Stiftung), Svetlana Samayoa (LAC Footprint Initiative, CICOMER) and Jacob Bilabel (THEMA1) supported the project. The design and layout of the Guidelines was completed by Thad Mermer.

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Supported by:



Federal Ministry for the
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Building and Nuclear Safety

based on a decision of the German Bundestag

Responsible?

Sustainable?

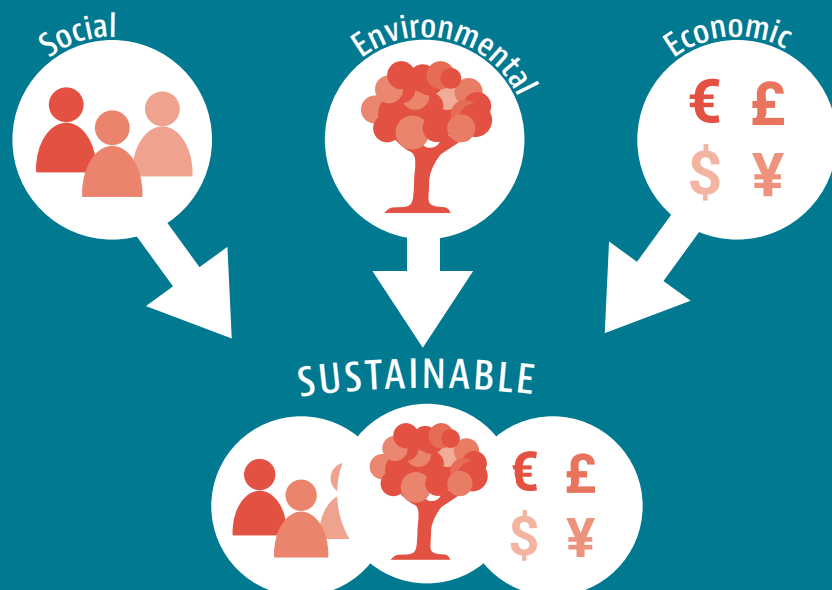
EXECUTIVE SUMMARY

OBJECTIVE

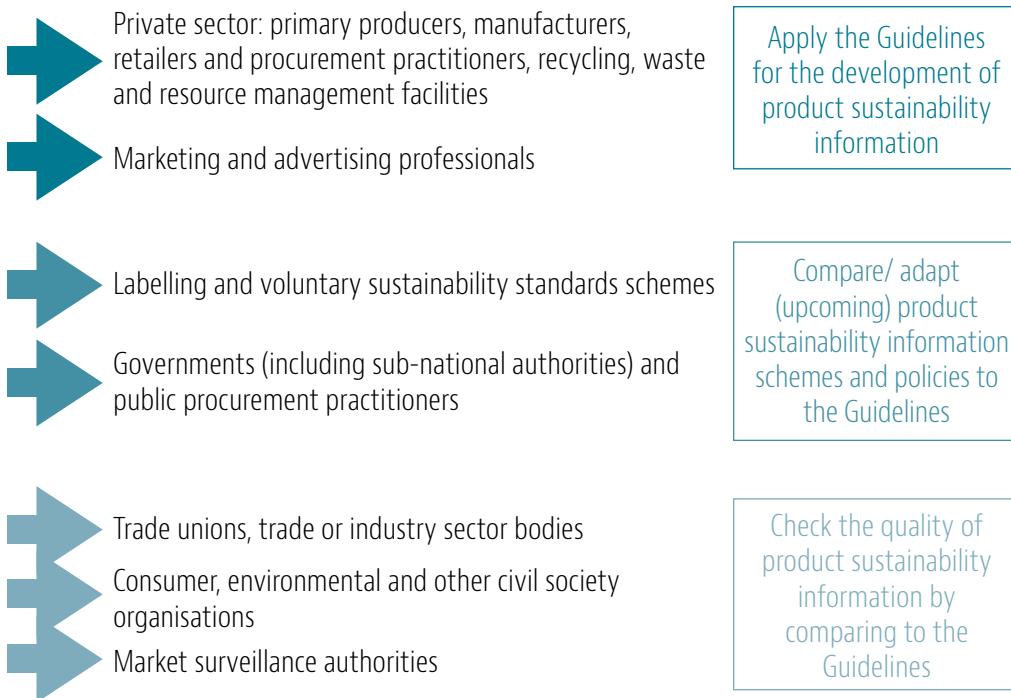
The Guidelines for Providing Product Sustainability Information (short the Guidelines) aim to provide value chain and public sector professionals with clear guidance on how to make effective, trustworthy claims to consumers, on product-related sustainability information. They are applicable to all regions and companies of all sizes. A key, long term objective is to generate global consensus by creating a level playing field for developing new, and revising existing, product sustainability information. Ultimately, the Guidelines aim to empower consumers to make informed sustainable choices.

The Guidelines' focus is on the information provided to consumers, to encourage more sustainable consumption patterns via the selection, usage and disposal of consumer products. This does not imply that the sole responsibility to reduce the adverse effects of product manufacturing and consumption on society and the environment lies with consumers. Sustainable consumption and production can only be achieved if all value chain stakeholders play their parts and commit to more environmentally and socially sound actions.

Product Sustainability Information, as regarded in the Guidelines, covers:



TARGET AUDIENCE



THE DEVELOPMENT PROCESS

The Guidelines build on recognised, well-established national, regional and sectoral guidance. They were developed in an international consensus-finding process under the 10YFP Consumer Information Programme for Sustainable Consumption and Production (CI-SCP)¹. Between June 2015 and October 2017, UN Environment and the International Trade Centre convened a working group comprising over 35 experts from various sectors and regions, which held several virtual meetings and one in-person workshop to develop the Guidelines. Comments received from more than 90 organisations during a two-month global consultation were also vital to the development process. The Guidelines are being road tested with organisations from different sectors and regions in 2018.

THE PRINCIPLES

The Guidelines' structure reflects a dual objective: to establish minimum requirements that must be met when providing product sustainability information to consumers (**fundamental principles**); and to encourage ambition, improvement and sustainability leadership over time (**aspirational principles**).

¹ The Consumer Information Programme is one of six programmes in the 10-Year Framework of Programmes on Sustainable-Consumption and Production Patterns (10YFP), which was adopted by the UN at the Rio + 20 conference. For more information: <http://www.oneplanetnetwork.org/consumer-information-scp>

FUNDAMENTAL PRINCIPLES



RELIABILITY

Build your claims on a reliable basis

- Accurate and scientifically true
- Robust and consistent
- Substantiated data and assumptions



RELEVANCE

Talk about major improvements, in areas that matter

- Significant aspects ('hotspots') covered
- Not masking poor product performance, no burden shifting
- Genuine benefit which goes beyond legal compliance



CLARITY

Make the information useful for the consumer

- Exclusive and direct link between claim and product
- Explicit and easy to understand
- Limits of claim clearly stated



TRANSPARENCY

Satisfy the consumer's appetite for information, and do not hide

- Developer of the claim and provider of evidence published
- Traceability and generation of claim (methods, sources, etc.) published
- Confidential information open to competent bodies



ACCESSIBILITY

Let the information get to the consumer, not the other way around

- Clearly visible: claim easily found
- Readily accessible: claim close to the product, and at required time and location

ASPIRATIONAL PRINCIPLES

THREE DIMENSIONS OF SUSTAINABILITY

Show the complete picture of product sustainability

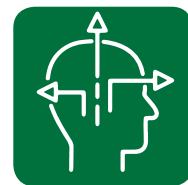
- Environmental, social, and economic dimension considered
- Burden shifting between the dimensions avoided
- Complementary certification schemes combined



BEHAVIOUR CHANGE AND LONGER TERM IMPACT

Help move from information to action

- Insights from behavioural science applied
- Consumers actively encouraged to play a role, where appropriate
- Longer-term relationship built with consumer



MULTI-CHANNEL AND INNOVATIVE APPROACH

Engage with consumers in diverse ways

- Various complementing communication channels used
- Different user groups addressed with different channels
- Information complementary and not overloading the consumer



COLLABORATION

Work with others to increase acceptance and credibility

- Broad range of stakeholders included in claim development and communication
- Joint communication channels employed
- Inclusive language used to make consumers feel part of a movement



COMPARABILITY

Help consumers choose between similar products

- Product comparisons substantiated and helpful for consumers
- Approaches initiated by government or third parties followed
- Specific guidance followed



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1) INTRODUCTION

A NAVIGATOR FOR COMMUNICATING PRODUCT SUSTAINABILITY INFORMATION

Sustainable consumption and production is increasingly a priority for business and for policy-making. It is a cross-cutting theme of the **Sustainable Development Goals (SDGs)**, directly addressed by Goal 12; and sustainable products (goods or services) are a growing business opportunity, especially in emerging and developing countries (Nielsen 2014). Good practices have shown that product sustainability information can have a positive impact on consumer behaviour (O'Rourke and Ringer 2016), supporting them in their buying decisions and guiding them in responsible product use and disposal. Many good efforts are already underway in this area.

However, the growth of markets for sustainable products is often impaired by the malpractice of greenwashing and the volume of information facing consumers, which can be imprecise, unclear, incomparable, unsubstantiated or irrelevant when guiding their choices. There is a proliferation of diverging and/or unchecked product sustainability information tools,² which can negatively affect the reputation of credible standards, labels and claims. This often results in mistrust and confusion among consumers, as well as among information providers in business and government.

These Guidelines were developed in response to calls – via expert consultation and in relevant literature – for international agreement and guidance on how to provide information on products' sustainability attributes and performance to consumers (UN Environment 2015). They aim to inspire information providers to build upon the valuable efforts already underway, in line with SDG Target 12.8 (see Box 1).

² Information tools include labels, voluntary standards and certification, product declarations, ratings, marketing claims, foot printing, life-cycle assessments, and other ways of communicating with consumers on environmental and social issues connected to products. They can be single- or multi-issue tools, and can follow a life cycle approach to provide a holistic perspective that considers the impacts of every stage of the product development process, including how a product is used and how it is treated responsibly at end-of-life.

Box 1: Sustainable Development Goals and consumer information



Target 12.8 of Sustainable Development Goal (SDG) 12: Ensure sustainable consumption and production patterns:

By 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.

OBJECTIVES

SET A COMMON GROUND FOR EFFECTIVE PRODUCT SUSTAINABILITY INFORMATION TO CONSUMERS

The Guidelines:

- address the underlying causes of information overload, consumer confusion and mistrust, and intend to ultimately create a level playing field to enhance consumer awareness, ease and uptake of sustainable choices on the purchase, use/re-use, disposal and recycling of products.
- include a comprehensive set of high-level principles for users to follow, and guidance on how to apply them. They cover fundamental and aspirational approaches and can be applied in developed and developing countries, and by companies of all sizes.
- were developed through a multi-stakeholder consultation, led by UN Environment and the International Trade Centre (ITC), under a working group of the 10YFP Consumer Information Programme³ (see Recognitions).

Box 2: The Guidelines' development process

The Guidelines for Providing Product Sustainability Information (short the Guidelines) build on recognised, well-established national, regional and sectoral guidance. They were developed in an international consensus-finding process under the 10YFP Consumer Information Programme. Between June 2015 and October 2017, UN Environment and the International Trade Centre convened a working group comprising over 35 organizations from various sectors and regions, which held several virtual meetings and one in-person workshop to develop the Guidelines. Comments received from more than 90 stakeholders during a two-month global consultation were also vital to the development process.

³ The Consumer Information Programme is part of the 10 Year Framework of Programmes for Sustainable Consumption and Production (10YFP), the implementation of which is target 12.1 of the Sustainable Development Goals.

TARGET AUDIENCE

The target audience of the Guidelines are providers of information, who can apply the Guidelines for the development of their product claims, as well as public and private organizations that develop or regulate product sustainability information schemes. Finally, the Guidelines also provide a tool to those that act as 'watchdogs', checking the quality of existing claims.



CONSUMERS AND SUSTAINABLE CONSUMPTION

While the Guidelines support information providers and other practitioners from the private and public sectors, their ultimate beneficiary is the consumer. A consumer, as referred to here, is a person purchasing, using and/or disposing of goods and services for private or commercial purpose (i.e. it includes individuals working in a private sector as well as in public sector such as public procurement for instance).



Figure 1: The moving landscape of consumer choice

Illustration based on: (WRAP 2015)

What motivates and drives consumer purchasing choice is complex, and varies from one consumer to another depending on their social, cultural, educational and economic background. Sustainability is only one of many consumer choice factors (WRAP 2015, see Figure 1), and different incentives - such as having a positive environmental impact - play different roles (for example, Accenture 2014). Furthermore, incentivizing *purchasing* behavior is only one of the purposes of sustainability information - using, re-using, sharing, recycling and disposing of products can also be addressed.

Consumers' expectations and the information they demand sometimes differ from what is legally required or regarded as important from a scientific or marketing perspective. These differences can be reconciled by developing and applying a deeper understanding of consumer interests and insights to reach an appropriate quality of sustainability information to meet their needs; and by using drivers to motivate and establish an emotional connection to more sustainable products to help change consumption behaviour and habits (e.g. nudging).

It needs to be considered that consumption decisions are never isolated and can be compensated (but also strengthened) by the effect they have on the so-called available household resources (i.e. money, time, etc.) (Wolf and Chomkhamisri 2015). Advanced product sustainability information should also contribute to an overall improvement, i.e. to more sustainable lifestyles.

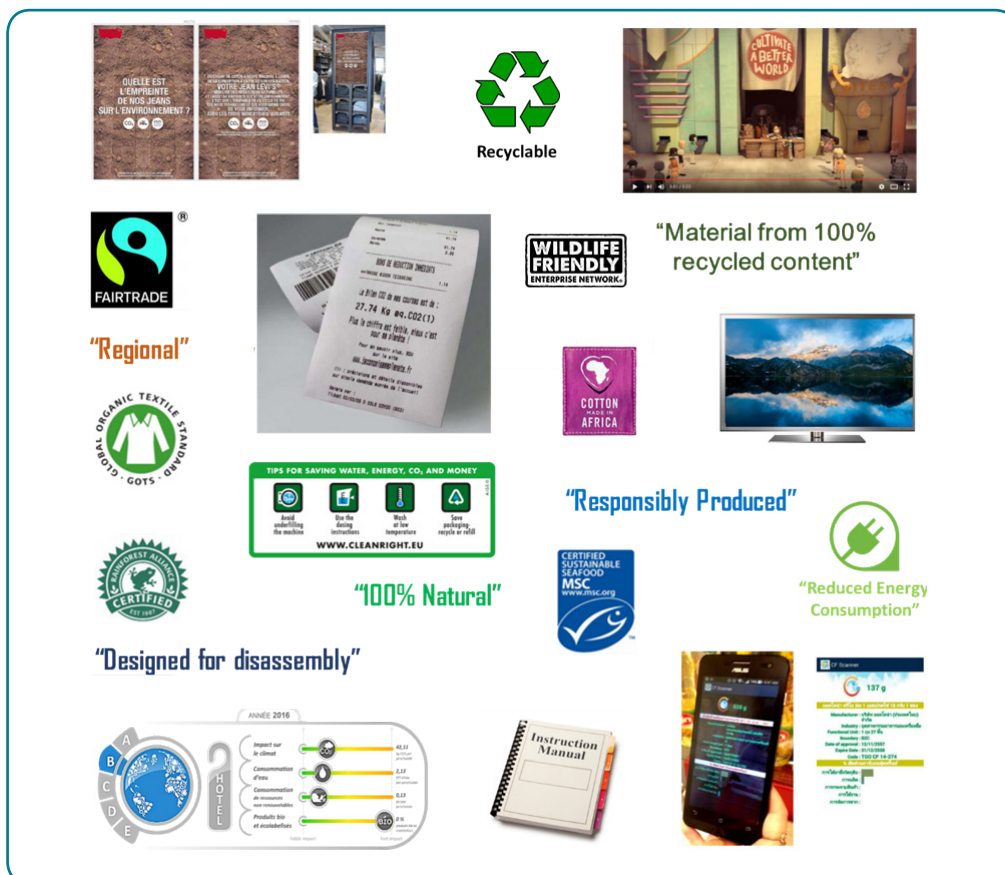


Figure 2: Selection of different ways to communicate sustainability information and/or call for sustainable consumption habits

PRODUCT SUSTAINABILITY INFORMATION

Product sustainability information, as considered in the Guidelines, refers to claims that cover one or multiple sustainability dimensions (economic, environmental, social). As a user of the Guidelines progresses from following the fundamental principles to the aspirational principles, the Guidelines encourage, over time, to move towards providing comprehensive information covering all three dimensions.

Providers of product sustainability information use many channels to engage with consumers (Figure 2). Information can be provided directly on the package or point of sale signs or posters, online, via social media, TV or radio adverts, on receipts, or in instruction manuals. The information may have a single-issue (e.g. carbon footprint) or multi-issue approach (e.g. environmental footprint), and can provide a holistic perspective considering the impacts of every stage of the product's life cycle, from raw material extraction and product manufacturing, through its use and disposal ('a life cycle approach'). ITC's Standards Map (n.d.) gives an overview of certification standards and labels by categories.

A common form of claim is a logo (sentence/affirmation or label), often complemented by written information and/or links to additional information. Figure 3 presents potential components of a claim.



Figure 3: Potential components of a claim
(ISEAL 2015a)

Box 3: Road testing of the Guidelines and case study collection

The 10YFP Consumer Information Programme road tested the Guidelines in 2018 to ensure their applicability over different regions, sectors and target groups. During this exercise, companies applied the Guidelines to their existing claims, and standard setting bodies, governments, NGOs, associations, and others to their existing provisions on product sustainability information to assess which principles are met, how they are met, and where future improvements could focus. The aim of the road testing was also to build up a library of case studies to share good practices and lessons learned between regions and sectors.

Organizations interested to learn more about the road testing are invited to contact ciscp@un.org.

Up to date information on this process is available at: www.oneplanetnetwork.org/consumer-information-scp



2) MINDSET FOR APPLYING THE GUIDELINES

This section sets the scene for the application of the Guidelines and describes the manner in which those applying them should approach and consider their sustainability efforts. If these general approaches are not at first available or possible, they can serve as inspiration for refinement and improvement. The mindset is neither a requirement nor an aspiration; it is a framework for applying the Guidelines.

LIFE CYCLE THINKING

Considering the whole product life cycle (Figure 4) means that sustainability impacts are assessed for every stage of a product's life, from resource extraction to disposal. When defining the sustainability information to be provided to the consumer this avoids that burden shifting occurs from one stage to another.

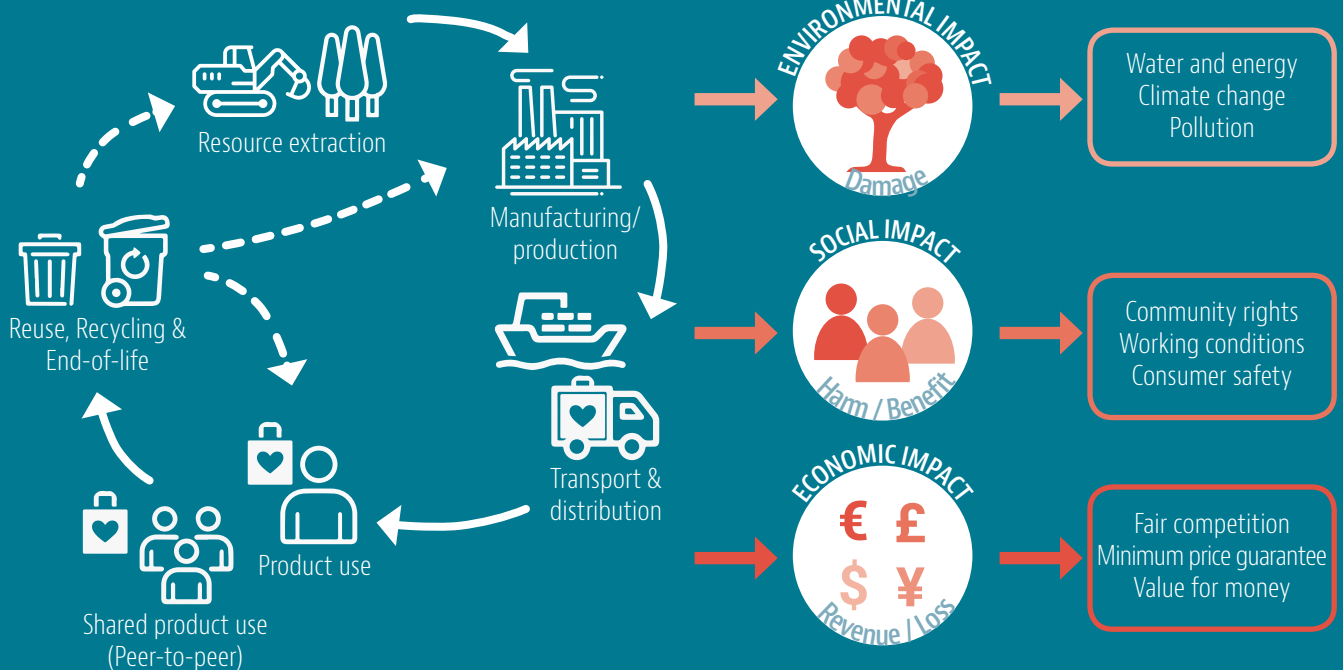


Figure 4: The life cycle of a consumer product and examples of environmental, social and economic impacts & benefits

In applying **life cycle thinking**, a holistic perspective of the product system is taken, considering most potential and actual impacts, to ensure that no unintended trade-offs arise⁴ nor potential positive or negative implications are overlooked. The latter is particularly relevant when information providers aim to motivate consumers to change their behaviour during the use phase or the end-of-(first)-life of the product.

Life cycle thinking does not necessarily imply quantitative, data-intensive measurement, and should not be confused with a life cycle assessment (LCA, standardized methodology: ISO 14040 (ISO 2006a)), which requires quantitative information and life cycle inventory data for detailed impact assessment. Validated information gained through consultations (e.g. focus group discussions) or consumer product reviews based on life cycle thinking can also be helpful to generate or complement product sustainability information.

HOTSPOTS ANALYSIS APPROACH

To put life cycle thinking into practice, a **hotspots analysis approach** can be taken to identify the most impactful or relevant stages, activities, material and energy flows and impacts within a product's life cycle. The identification of these 'hotspots' requires quantitative or qualitative information. Once a given product's hotspots are identified, the only data that needs to be collected to define and communicate the product's sustainability information is that which relates to the hotspots. This can extensively reduce the data collection effort and is consequently a feasible way for Small and Medium Sized Enterprises (SMEs) to start applying life cycle thinking.

Box 4: Support for applying life cycle thinking

It is understood and reflected in the Guidelines' principles that there are often difficulties in applying life cycle thinking due to lack of data and resources. However, initiatives such as the Life Cycle Initiative provide capacity development and support expertise and data availability globally; particularly in the field of environmental Life Cycle Assessment (LCA) (other areas are Social Life Cycle Assessment and Life Cycle Costing). Work is also underway in the area of hotspots analysis to help focus on those issues/ impacts which, if reduced, will have the greatest improvement in the sustainability of products (UN Environment, 2017). This aims to reduce the level of complexity of applying life cycle thinking.

More information: www.lifecycleinitiative.org

MAINSTREAMING SUSTAINABILITY

Ideally, a product-related sustainability claim becomes an integrated part of the entire **decision-making and management process** for the development and marketing of new or improved products, or of a brand itself. Having clear goals and appropriate processes (including collaboration with stakeholders) in place helps companies to maintain and improve their products' performance over time and to apply this logic to other products in their portfolio and eventually mainstream sustainability in the entire organization and its value chain.

The Guidelines' scope covers **product sustainability information** only. In line with the fundamental principles, which follow, it is important to enable consumers to distinguish between product sustainability and brand sustainability, and to not transfer brand-related claims to the product (unless this is substantiated) or vice versa.

⁴ Considering relevant environmental, social and economic impacts prevents the so-called burden shifting; e.g. improving the climate performance of meat products (by increasing livestock units per area) could lead to adverse effects on animal welfare and unsustainable land use patterns.



3) FUNDAMENTAL PRINCIPLES

These principles describe the fundamental criteria on which sustainability claims must be based. The Guidelines request its users to comply with all of the fundamental principles, which seek to build and reinforce each other, and lay the foundations for the subsequent 'aspirational principles'.

Under each principle, guiding questions and examples are provided to help users understand and apply the principles' requirements.

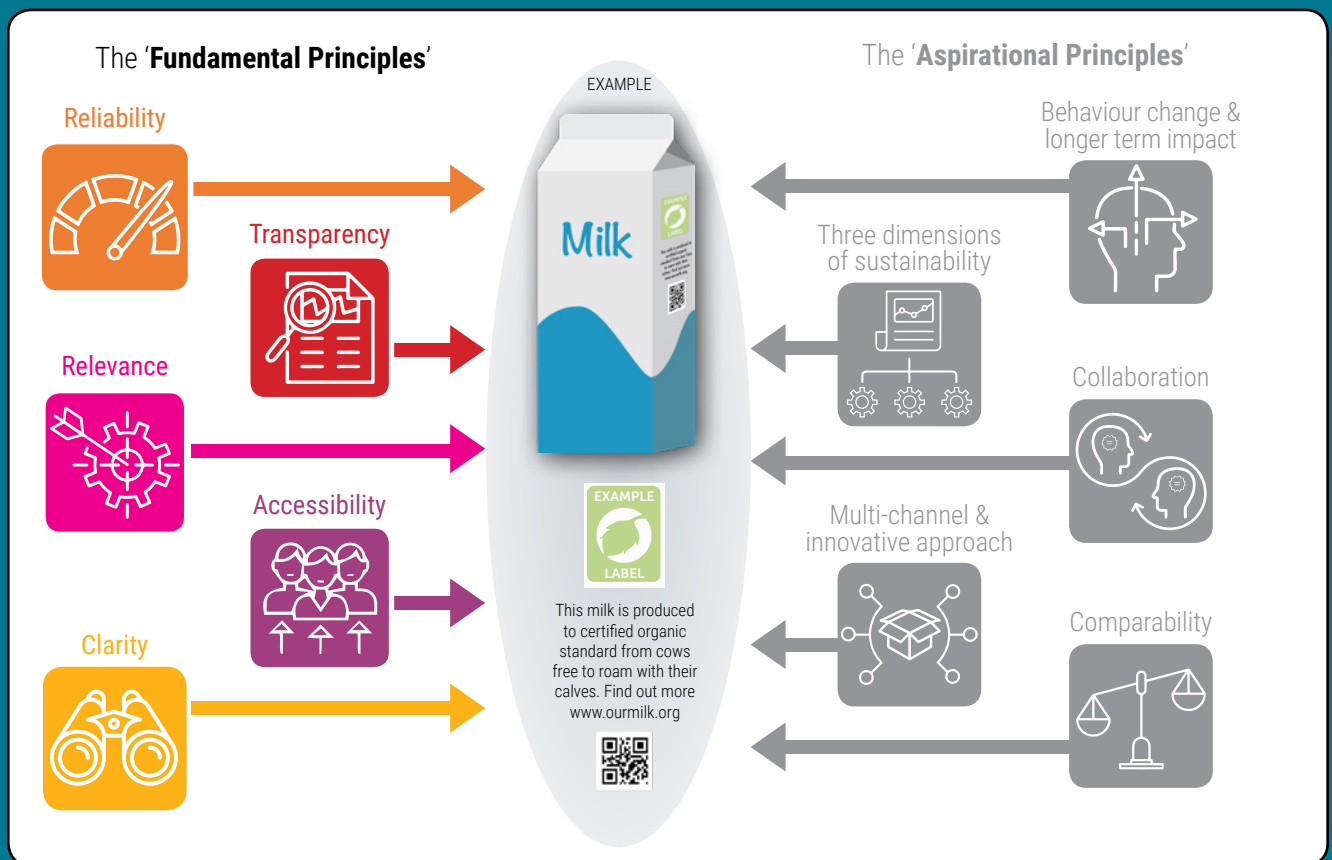


Figure 5: Fundamental Principles for providing Product Sustainability Information

PRINCIPLE 1

RELIABILITY



Build your claims on a reliable basis

- Ensure that the message conveyed follows and reflects the evidence you have (what has been measured or evaluated)
- Be sure, or obtain confirmation from the experts who provide the evidence, that their methods and data are state of the art
- Be aware of exclusions, limitations and assumptions that were used in building the evidence for the claim – and communicate them

Gaining consumers' trust is a prerequisite for ensuring that they purchase and use products in a more sustainable manner. Telling consumers the truth is fundamental to gaining their trust. Therefore, claims need to be based on substantiated evidence. Consumers can then be sure that their action contributes to a wider good, something they are increasingly looking for.⁵

The sustainability claim **must** be **accurate**.

It **must** be **based on a generally accepted methodology in the relevant scientific field(s)**.

Methods and standards must be applied in a way that is **consistent** with the sustainability claim.



The sustainability claim **must** be **robust**.

Guiding questions:

- Are selected methods, standards and data endorsed or applied by governments, NGOs or competitors; or provided or backed by reliable scientific institutions?
- Do the aspects assessed match the aspects that are communicated? Can you be sure that any uncertainties relating to supporting information do not jeopardise the basis of the sustainability claim? Could others uncover uncertainties or exclusions, therefore damaging the claim and your reputation? Would other stakeholders be able to support the sustainability claim?

⁵ A (Unilever, 2017) study "suggests that the trend for purpose-led purchasing is greater among consumers in emerging economies than in developed markets. While 53% of shoppers in the UK and 78% in the US say they feel better when they buy products that are sustainably produced, that number rises to 88% in India and 85% in both Brazil and Turkey."

Table 1: Example of accuracy and robustness

Product: T-Shirt	Do (company A)	Don't (company B)
Claim and applied method	<p>"Our T-Shirts are organic"</p>  <p>Method: GOTS Version 5.0</p>	<p>"Our T-Shirts are organic"</p>  <p>Method: [Hypothetical] RTS Standard</p>
Discussion	<p>Company A has participated in the GOTS certification scheme. The GOTS standard is an accepted methodology to guarantee a minimum content of organic fibre (+95%), the exclusion of hazardous substances in garments sold as organic, plus social requirements. Compliance is based on annual independent inspections at production sites.</p> <p>Revision processes of the standard are based on a collaborative approach and include participation of relevant stakeholders (e.g. Ecological and Toxicological Association of Dyes and Organic Pigments, Social Accountability International, International or Clean Clothes Campaign). GOTS criteria cover the entire supply chain from fibre to end product.</p>	<p>Company B bases its claim on its own (hypothetical) labelling standard. It would need independent assurance or endorsement by a scientific institution or government that the methodology is robust, e.g. to ensure that the T-Shirt is made from organic cotton and that there is sufficient evidence to back up this claim. Without sufficient transparency/ documentation on the supply chain and production processes the claim cannot prove to be accurate.</p>

If the sustainability claim is based on an expected or assumed change in consumer behaviour, the information provider **must** be able to prove that its **assumptions on impact** are **substantiated**.

Guiding questions:

- Has consumer testing shown 'improved' (desired effect) behaviour (e.g. higher recycling rates, more efficient product use, purchase of sustainable product)? Do comparable cases, scientific studies or consumer surveys provide evidence for the assumed behaviour change?

Box 5: Reliability of Life Cycle Assessment

For the evaluation of environmental impacts, life cycle assessment (LCA) has become a proven and increasingly applied methodology. However, gaps exist for example regarding certain impact categories not yet fully modelled, and the result always depends on specific scope and assumptions, as well as data and indicators used by the study (which makes the LCA result context dependent). For these cases, a combination of LCA and other complementary tools (such as certification schemes) can fill the gap to obtain a comprehensive overview of the environmental and social impacts of products, in order to support life cycle management and value chain communication (Chkanikova and Kogg 2015, Forest Stewardship Council 2016).

The sources of information and data **must** be **trustworthy**. Trustworthiness can be enhanced by asking an external body to provide its assurance on the information and data, to different levels of reliability (see Figure 6). When third party verification is applied, the verifying organisation **must** be **independent**⁶ and **competent**⁷. Third party verification is not a requirement of the Guidelines, but is considered the most reliable option.

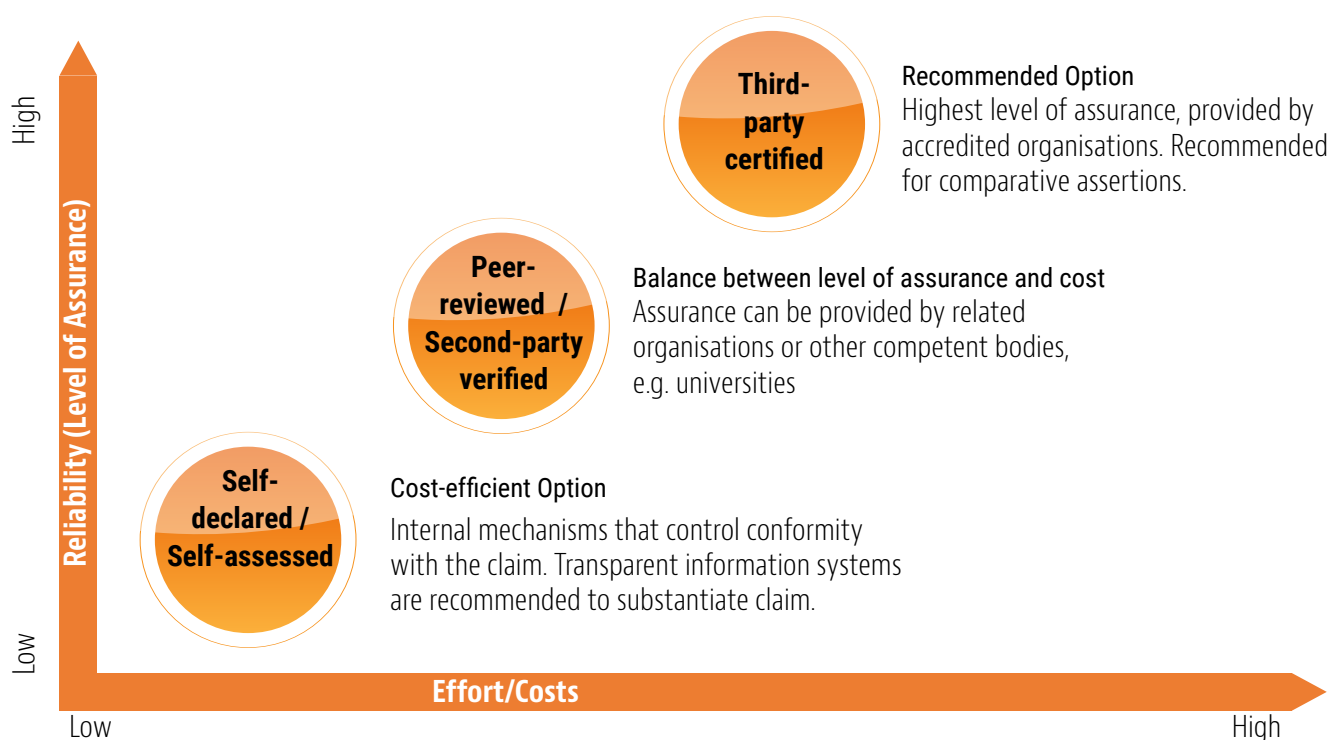


Figure 6: Assurance models

(own representation based on (ISEAL 2015a))

⁶ Independence is specified by ISO 17021 (ISO 2015) or by the ISEAL Code of Good Practice for Assuring Compliance with Social and Environmental Standards: <http://www.isealalliance.org/our-work/defining-credibility/codes-of-good-practice/assurance-code>. Further details on reviewer qualification (and assistance to reliable LCA application) can be found in the ILCD Handbook Package by the European Commission (Wolf et al. 2012).

⁷ Competence of verifiers is defined by e.g.: knowledge of relevant sector, product and product-related sustainability aspects. See also: ISO 14025 (ISO 2006b)



Guiding questions:

- Is the information or data verified and was it verified by a competent body? Is the quantity and quality of data sufficient? * Are data sources trusted by relevant stakeholders?
- Is the verifier providing a truly independent, objective view or are their views somehow influenced by links to the provider of information? Is the verifying organisation accredited to recognised standards or codes of practice? Does the verifier have proven experience in providing assurance in the field of product sustainability?

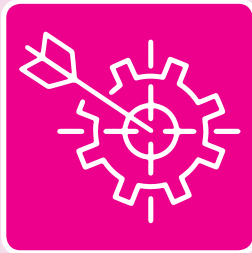
* Examples for ambitious data quality requirements: Environmental Footprint Guide (European Commission 2013) and ISO 14044:2006 (ISO 2006a)

Box 6: Certification and accreditation standards and guidelines

- ISO/IEC 17021-1:2015: Conformity assessment – Requirements for bodies providing audit and certification of management systems (ISO 2015).
- ISO/IEC 65: (17065) Conformity assessment - General requirements for bodies operating product certification systems
- ISO/IEC 67: 2004 Conformity assessment – Fundamentals of product certification
- ISO/IEC 17011:2004 Accreditation – General requirements for accreditation bodies accrediting conformity assessment bodies (ISO 2004).
- There are also other (in some cases more cost-efficient) forms of impartial oversight and verification such as using a “risk-based approach to conformity assessment”. For more information: (ISEAL 2012).

PRINCIPLE 2

RELEVANCE



Talk about major improvements — in areas that matter

- Highlight product characteristics or innovations that really make a difference to the overall sustainability performance of the product
- Make sure that the subject of the claim is in an area that is integral to the product, i.e. its function, materials or performance
- Check legal requirements before making a claim, so that your product is significantly better than what is already required by law.

Consumers need to be sure that sustainability claims are relevant to the product and that their informed purchasing decisions and, if applicable, their changed behaviour is relevant and has an impact. Personal benefits can be a driver for consuming more sustainable products, e.g. products that use less energy or have a longer durability and are therefore more cost-efficient. Specific information on the relevant aspects concerning issues of personal benefit combined with e.g. environmental benefits, can stimulate purchase intentions (Visser et al. 2015).

The sustainability claim **must** provide information on the **relevant aspects** (e.g. processes, materials used in production; or impacts linked to the intended use of the product)⁸, which, according to the selected scope of the underlying study and the applied methods, **contribute significantly** to the sustainability profile of the product, i.e. the **sustainability hotspots**. At the same time, 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)**.

The claim **must** refer to a **genuine and measurable benefit** of the product and **must exceed what is already required by law**⁹.

Guiding questions:

Is the subject of the claim a major driver of the sustainability performance of the product? Is this valid for the technology and the region where the product is produced and used? Do other stakeholders share the same view? Is the assessment complete or have relevant aspects been excluded?

Does the product exceed regulatory requirements of the production countries and (where required) also of the consumption countries?¹⁰ Is the product performing better than the market average?

⁸ Further guidance and examples for defining hotspots can be found in UN Environment's methodological framework for hotspots analysis (2017), and the European Commission Environmental Footprint Guide (2013).



⁹ Making claims on what is already legally required can be a black practice in some jurisdictions (e.g. the European Union)

¹⁰ This is particularly relevant for claims addressing the use phase.

Box 7: Risk of burden shifting

Claims on processes and materials (such as “use of natural fibres”, “100% recycled content” or “free from synthetic material”) can be helpful, if this does not detract from more relevant hotspots, i.e. burden shifting is avoided. In line with the principle of reliability, the claim must be substantiated by quantitative (e.g. LCA studies) or qualitative (e.g. focus group discussions) information.

Table 2: Example on sustainability hotspots and compliance beyond law

Product: Mattress	Do (company A)	Don't (company B)
Claim	 <p>“Our mattress is eco-friendly and good for your health.”</p>	 <p>“Our mattress is ozone friendly.”</p>
Discussion	<p>Organisations using the EU Ecolabel on their products go beyond what is required by law. The criteria for the product category ‘mattress’ require – among others – the following and underpin the claim:</p> <ul style="list-style-type: none"> • High-quality long-lasting product • Hazardous substances restricted • Indoor air pollution reduced 	<p>CFC damages the ozone layer but it has been banned internationally. The impact on the ozone layer is not a hotspot for mattresses anymore and CFC-free labelled products are not beyond legal compliance. The law requires products to be CFC free, therefore the label becomes obsolete.</p>

Box 8: Life cycle and value chain complexity and lack of transparency

The organisation making a product sustainability claim must ensure that the product exceeds the legal requirements of the country of consumption (where the consumer is using and disposing of the product) and country(ies) of production (countries where raw materials are extracted and processed or where a product is assembled or manufactured).

As in the case of the mobile phone sector, proving to exceed the legal requirements of the countries of production can be challenging due to the lack of value chain transparency, making it difficult to trace back all materials to their origin. In such exceptional cases, the Guidelines allow users to consider the regional/sectoral context. An organisation can issue a claim even if it does not have full transparency on all materials or production processes but is significantly outperforming its competitors (and can prove this).

The limitations of the claim must be communicated to the consumer in accordance with the fundamental principles of the Guidelines. Further, the providers of the information must actively work towards gaining transparency over their suppliers over time and close the evidence gaps.

Box 9: Single-issue criteria versus multi-issue criteria claims

Single-issue criteria claims such as carbon footprint, energy, conflict-free mineral sourcing, child-labour free or animal welfare labels are widely used. When these claims are clearly linked to the product and to widely accepted environmental and social priorities, they can help consumers to make informed choices on more sustainable products (OECD 2000).

Single-issue claims can be an entry point or stepping-stone to a more comprehensive approach, but they can have several limitations and create the risk of hiding or shifting negative impacts from one sustainability area or issue to another. Therefore, users of the Guidelines are encouraged to use multi-issue claims, or to ensure that negative impacts are avoided in areas beyond the cited issue, to avoid unanticipated or unexpected consequences.

PRINCIPLE 3

CLARITY



Make the information useful for the consumer

- Avoid vague, ambiguous and broad “general environmental/social benefit” claims
- Share information that helps consumers understand their role in improving product performance and the impact of their consumption
- Provide simple guidance on how consumers can alter or improve their consumption behaviour

Consumers want clear messages and language to inform their purchasing decisions, to know how to use the product responsibly and what to do at the end of its life (e.g. re-use, recycling, responsible disposal). This enables consumers to take action – even if they may be easily distracted, confused or not able to read instructions in a particular language. The use of (info-) graphics, pictograms, or other forms of visualising information can overcome potential language barriers.¹¹ By facilitating consumers to take action, producers and retailers can reliably claim that the product’s sustainability attributes promote sustainable consumption.

Box 10: About “greenwashing”

“Greenwashing” is derived from the term “whitewashing”. It is an attempt to mislead consumers and to market products more environmentally friendly than they actually are. This can be an exaggeration or misrepresentation of an improved environmental performance, a claim that cannot be verified, is irrelevant or is simply false. Even though “green” relates to environmental claims, the expression is sometimes also used in the context of social and ethical product information.

“Greenwashing” has the potential to demotivate consumers to purchase and use more sustainable products and penalize providers of information who adhere to appropriate guidance. The Guidelines’ Fundamental Principles aim to remove “greenwashing” practices, in all sustainability areas.

¹¹ The Life Cycle Initiative and the Consumer Information Programme have developed guidance on the communication of information derived from hotspots analysis, which includes examples of graphic display/ visualisation: <http://www.lifecycleinitiative.org/new-hotspots-analysis-methodological-framework-and-guidance/>

Box 11: Avoid general sustainability benefit claims

Broad, general sustainability benefit claims are difficult, if not impossible, to substantiate and can mislead or confuse consumers. Terms that should be avoided are (non-exhaustive list):

“environmentally friendly”, “eco-friendly”, “eco”, “good for the environment”, “sustainable”, “green”, “carbon friendly”, “natural”, “non-toxic”, “ecologically safe”, “pollutant free”, “clean” “zero emissions”, “an ethically correct choice”

If such a general claim is made, it should be accompanied by clear and prominent qualifying language/ standards that limit the claim to a specific benefit or set of benefits.



For example, a claim such as “Eco-friendly: made with recycled materials,” would be misleading if: (1) the statement “made with recycled materials” is not clear and prominent; (2) the trader cannot substantiate that the entire product, excluding minor, incidental components, is made from recycled material; (3) making the product with recycled materials does not make the product more environmentally beneficial overall; and (4) the advertisement’s context implies other misleading claims.

There **must** be a **direct link** between the sustainability claim and the product to avoid generalization of the claim.

The consumer **must** be able to **differentiate between product and brand information**.

The information (visual, text-based or via design) provided to the consumer **must** be **explicit and easy to understand** and **must** be **complemented**, if otherwise misleading, with an **explanatory statement**.

Table 3: Example for direct link of claim to the product

Product: Eggs	Do (company A)	Don't (company B)
Claim		
Discussion	<p>The complementing claim is directly connected with the product. This means that the consumers can be sure that the eggs they are buying are organic.</p>	<p>Complementary but generalised claims might give the impression that all products from the same brand/category are covered by the claim. Due to the use of ‘our’ rather than ‘these’, the consumer might think that all eggs from the brand are organically produced.</p>

Guiding questions:

- Is the connection between the claim and product clear or might consumers think that the claim is also valid for similar/all products from the same brand?
- Are all visual methods of communication (e.g. symbols, pictograms) clear and unambiguous? Is information clear and concise or too detailed and confusing? Is plain, non-technical language used for text-based information? Are additional details available elsewhere (e.g. online) to support a better understanding of the claim (more detailed, technical information can be made available here for those that seek it; see also Principle 5: Accessibility)?
- For quantitative information: Is context or a reference system provided, so consumers can better understand the impact of their consumption (e.g. understand higher and lower carbon footprints)?

Table 4: Example for explicit and easy to understand information



Product: Box of Chocolates	Do (company A)	Don't (company B)
Claim		
Discussion	<p>Concise visual information, complemented by simple text, helps the consumer to understand not only if the product packaging is recyclable but also whether it can be recycled based on the availability of recycling infrastructure. Guidance is further provided for individual packaging components, in this case also different types of plastics used for the inner tray and film. It is also clear to the consumer what his/her role is, i.e. to recycle.</p> <p>Further information on the label: www.OPRL.org.uk</p>	<p>While the Mobius loop is an internationally recognised symbol for recycling, its use without text assumes that all consumers understand its meaning; and/or that <i>all</i> of the product's material can be recycled. It also only shows that the packaging is recyclable but not that this recycling is actually available via local infrastructure. If wanting to comply with the international standard ISO 14021 (ISO 2016a) a qualified claim must adequately convey the limited availability of collection facilities.</p>

The **limits** of the sustainability claim **must** be **clearly stated** and **must not** be **misleading** or **ambiguous**. A **single-issue criteria must not be used to claim that** the entire **product is 'sustainable'** when other issues may make it otherwise. For instance, a recycled, resource-, or energy-efficient product cannot be claimed as overall 'sustainable' if workers in the value chain are not guaranteed fair wages or conditions; thus, precise language that is clear on the limits of the claim must be used.

Guiding questions:

- Is the claim masking negative impacts that are or could be known by the provider of information? Are limits of the claim clearly stated?
- Is imagery used in a way that is not likely to be misinterpreted?

Table 5: Example related to the limits of a claim

Product: Milk	Do (company A)	Don't (company B)
Claim	 <p>"We measure our impact on the climate"</p>	 <p>"We save the environment"</p>
Basis for the claim	The National Guideline on Product Carbon Footprinting (by Thailand Greenhouse Gas Management Organization).	
Discussion	The carbon label is based on a stated, accepted methodology and only communicates the amount of CO ₂ emissions associated with the product. There is no claim on other types of emissions reduction or other impacts on the environment. Company A has not exaggerated the limit of the claim.	A claim that is based on a carbon footprint must not include any assertions that are wider than the underlying study. Further research/proof would be necessary to back up a claim that addresses wider issues, e.g. conservation of the environment or natural resources. Company B has exaggerated the limit of the claim and therefore the sustainability benefits of the product, using emotive, hyperbolic language which misleads the consumer.

Box 12: Communicating multi-issue criteria claims

Multi-issue claims can be complex and hard to digest for consumers, particularly if some of the communicated sustainability impacts are not commonly associated with the product. *Principle 1: Relevance* requires the claim maker to communicate only relevant issues, but even this may be too complex if multiple hotspots have been identified. Thinking about how best to present the information in context (relative or absolute numbers, scales etc.) can enhance its clarity. While no conclusive results are yet available, there are initiatives underway looking at communicating multi-issue criteria claims, for instance the Product Environmental Footprint of the European Commission.

Further guidance is provided in a study commissioned by the European Commission (BIO Intelligence Service 2012).

Table 6: Example on explicit and easy to understand information

Product: Mobile phone	Do
Claim	
Basis for the claim	Blue Angel Eco-Label according to RAL-UZ 106 for "Mobile Phones"
Discussion	<p>The label is awarded to the product based on an LCA process, but the label itself clarifies its goal and position in simple language for the consumer. This allows consumers to get a quick understanding on the relevant product attribute(s). Additional relevant attributes and specifications can be obtained online:</p> <ul style="list-style-type: none"> • low electromagnetic radiation • criteria for extending the service life • promotion of take-back programs and recyclable design • avoidance of environmentally harmful and health-hazardous chemicals

PRINCIPLE 4

TRANSPARENCY



Satisfy the consumer's appetite for information, and do not hide

- Allow consumers to evaluate the information that underpins the claim
- Provide comprehensible information
- Adapt the information supply to the consumer's interest and product-related needs: from general, easy-to-understand to detailed and complex where appropriate
- Do not make a claim when the underlying information is considered confidential

Consumers expect sufficient information to be available so that they have the option to evaluate the basis for the sustainability claim, should they wish. Information providers therefore need to strike a balance between providing too much information initially (e.g. on the product or at point of sale), and providing sufficient information elsewhere for consumers to research and make decisions (e.g. on the company website).

It **must** be clear **how, and by whom**, the sustainability claim was developed; and who provided the evidence behind the claim, and how (e.g. through a scientific study, multi-stakeholder process, company, etc.).

The consumer **must be able to trace how the sustainability claim was generated**, at least the most impactful burdens of the life cycle where improvements have been made must be available. Selected **methods, data sources, assumptions or professional judgements, value choices** (e.g. for aggregation of data) **must be available / published**. This is particularly important for single-score¹² claims to show how the score was reached.

Information subject to confidentiality **must be accessible to competent bodies** that can verify the claim, noting that information on "health and environment" should not be considered confidential.¹³

Guiding questions:


- Is the claim self-declared or verified by a competent, independent third party? If the claim is verified, is the certificate number clearly provided/available? Is a list of the bodies/ stakeholders involved in the claim development process available?
- Are consumers and/or competent bodies able to assess the quality of information, and how/if it was verified?
- Can the underlying information be made available to the public or at least to a competent body?

¹² Single score: sustainability aspects are aggregated into one number. Also environmental labels can aggregate environmental impacts into a single-score.

¹³ See for example: Stockholm Convention (UN Environment 2009)

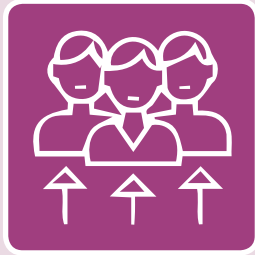


Table 7: Example on traceability of the claim and the claim development

Product: Tea	Do (company A)	Don't (company B)
<p>Claim</p>	<p>"Tea bearing the Fairtrade mark meets the internationally-agreed social, environmental and economic Fairtrade Standards"</p> 	<p>"Our tea producers receive fair payment"</p> <p>No further information is provided on or close to the product.</p>
<p>Discussion</p>	<p>For Fairtrade products, a Fairtrade Minimum Price (where it exists) and a Fairtrade Premium must be paid. The use of the label demonstrates that the product of company A has gone through this process, was awarded with third party certification and can justify the claim.</p> <p>A good practice is that certification/verification/assurance results are listed. This is often a unique number relating to the conformity assessment body (CAB) or certification body (CB) that assures the good or service.</p>	<p>It is not transparent to the consumer what this claim is based on. Self-declared claims must be backed up by further information – at least upon request or further investigation.</p>

PRINCIPLE 5

ACCESSIBILITY



Let the information get to the consumer, not the other way around

- Make the claim clearly visible for consumers (e.g. front of pack, appropriate font size, graphics/logo)
- Provide the information when and where the consumer needs it
- Avoid any barriers (e.g. technical) and use several communication methods, so that different information seeking habits are respected and satisfied
- Tackle constraints like limited space with direct links to online resources

Time and interest are often limiting factors for consumers when making a purchasing decision, particularly for products bought frequently (e.g. groceries). Purchasing and usage behaviour can be more difficult to change as a result. Equally, if product attributes have been altered to realize sustainability benefits through behaviour change (e.g. concentrated laundry detergents), it is vital to make this information visible to consumers, for them to act on it and realise the benefit. The more accessible the information, the more likely the consumer will take notice.




The required information **must** be clearly **visible**.

The information **must be readily accessible at the time and location the consumer needs it**, during research into buying options, the point of purchase or use (as relevant).

Guiding Questions:

- Can consumers easily find the sustainability information? Are they able to come across or find the information using customary means of communication in their region (on-pack and point of sale, leaflets, websites, social media...)?
- Is the basic information as close to the product as possible and accessible without the help of external devices (e.g. scanners, websites; though these may help later)? Are there barriers (intended or unintended) that impair access to the information (e.g. small font size, technical language or data)? Are consumers able to dive deeper and evaluate the level of transparency (principle 4) and reliability (principle 1) of the information (e.g. web-based information)?

Table 8: Example of accessibility of information

Product: Orange juice	Do (company A) (good practice)	Do (company B) (but improvable)
Claim	 <p>On-pack CO₂ label</p>  <p>QR code for additional information</p>	 <p>On-pack CO₂ label</p>
Discussion	<p>Making information available on complementary channels can aid understanding and decision-making. By providing basic information on-pack, and extending it with a web-based application via a barcode or smart label, the consumer has the possibility to better understand its impact.</p>	<p>If only a carbon footprint label is provided on-pack, consumers do not have the opportunity to verify the information. This is particularly important for labels which are less well-known and where consumers do not have any leads on how they can access further information.</p>

Box 13: Accessibility of information for disposal: Electronic products

For many countries, electronics collection and recycling is a serious challenge. Effective product take-back schemes and environmentally sound recycling facilities are lacking while huge amounts of electronic waste are created and discarded in an inadequate way. Sustainability claims for electronic products should contain information about where they must be sent to ensure safe and environmentally sound recycling (preferably at the local/national level where sold). Information about any toxic and hazardous chemicals or materials used in electronic products should be made available to the general public and should be part of any sustainability claim to minimise any risks of exposure to hazardous materials to consumers, waste dealers, recyclers – and to the environment. The information should not only be available on the product but also for example at the point of sale, municipality or company/product websites.

Box 14: Accessible text-based consumer information

To inform and engage consumers it is important that text-based information is readily legible for a person with normal vision. Specific guidance is available for legibility in food labelling, which can also be applied for sustainability information: e.g. (FoodDrinkEurope and EuroCommerce 2013)

It is also recommended to translate sustainability information into local languages and dialects or use self-explaining visual information.

Box 15: Digital media: Opportunities and challenges

Weblinks, Barcodes or QR-Codes can be an appropriate measure to extend consumer information beyond the package or the point of sale and bypass constraints such as limited space. It is an opportunity to make use of further communication tools such as graphics, videos, or links to production sites, to enhance understanding and transparency. It also enables interaction with other consumers, or to see what third parties (e.g. NGOs, rating websites) think about the product's sustainability performance (see also the Aspirational Principles).

On the other hand, reluctance of consumers to consult such information is perceived to be high and can also be limited by (mobile) internet availability.



4) ASPIRATIONAL PRINCIPLES

Providing product sustainability information to consumers is a dynamic process, in which consumers should be engaged. Not only should information be provided *to* them, but they should be consulted and interacted *with*, to better understand their information needs.

These aspirational principles are for information providers to go beyond the fundamental principles and to continuously improve the ways in which they communicate to consumers. They are not compulsory to implement (when following the Guidelines), but all users should ultimately aspire to do so. **The fundamental principles must not be abandoned or replaced by the aspirational principles.**

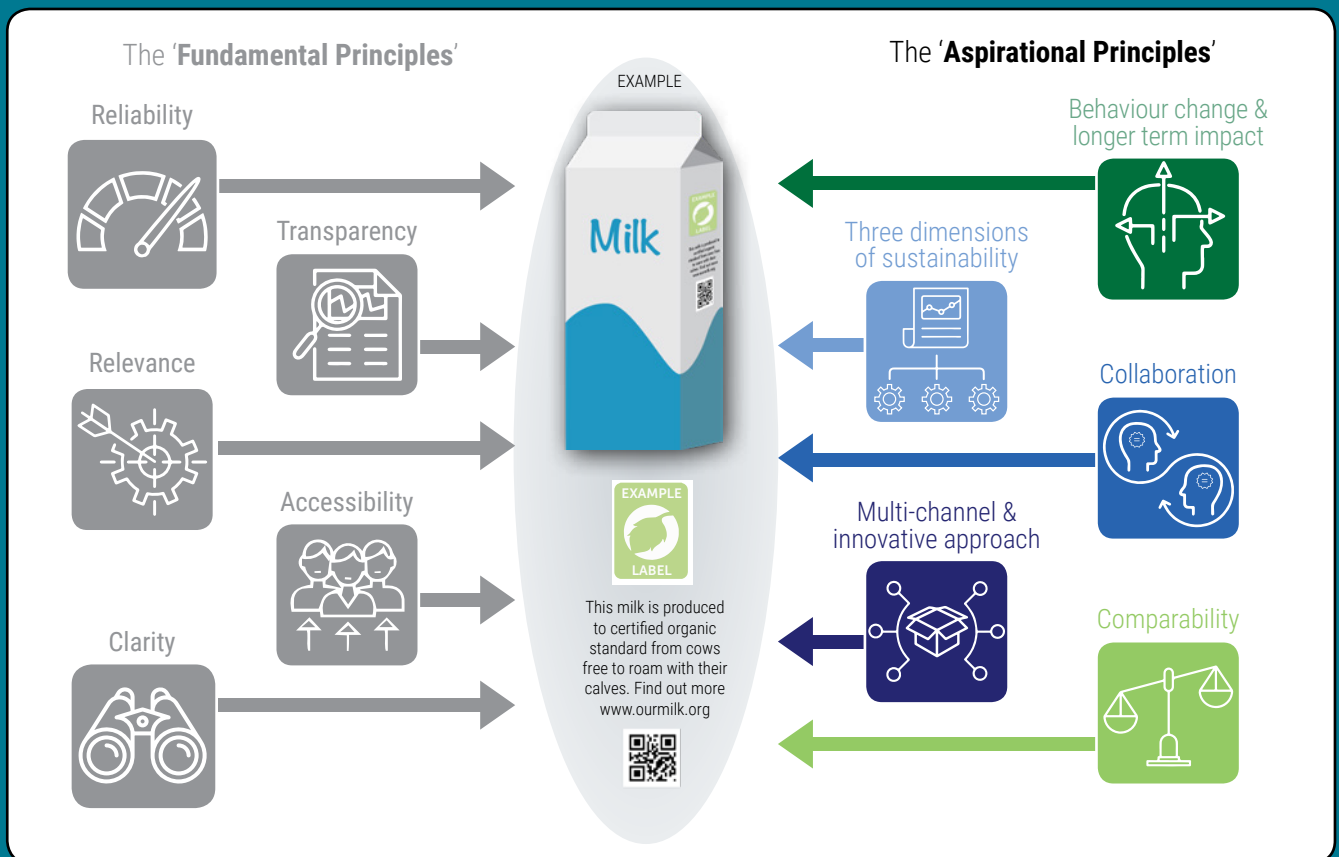


Figure 7: The Aspirational Principles for Providing Product Sustainability Information

PRINCIPLE 6

THREE DIMENSIONS OF SUSTAINABILITY



Show the complete picture of product sustainability

- Inform the consumer of the improved performance of your product in all three sustainability dimensions and make sure all relevant aspects of sustainability are considered
- Make your sustainability claim tangible and specify how your product performs better in all sustainability dimensions

Consumers require comprehensive and balanced information, which ensures that no burden shifting occurs from one sustainability dimension to another (for example, a new chemical decreases the climate impacts of the product but leads to deterioration in work place safety).

All **three dimensions of sustainability should be taken into account** for the provision of information, albeit with a particular focus on the most relevant aspects/hotspots for a given product (Figure 8).

A **combination of complementary certification schemes should be taken into consideration**.¹⁴

If a **single-score**¹⁵ is used to express the overall sustainability performance, **references to each of the dimensions should be further specified** (e.g. emissions reductions, energy or water use, fair remuneration to workers) according to the fundamental principles (e.g. relevance, transparency), to justify the score and show that no burden-shifting has occurred.

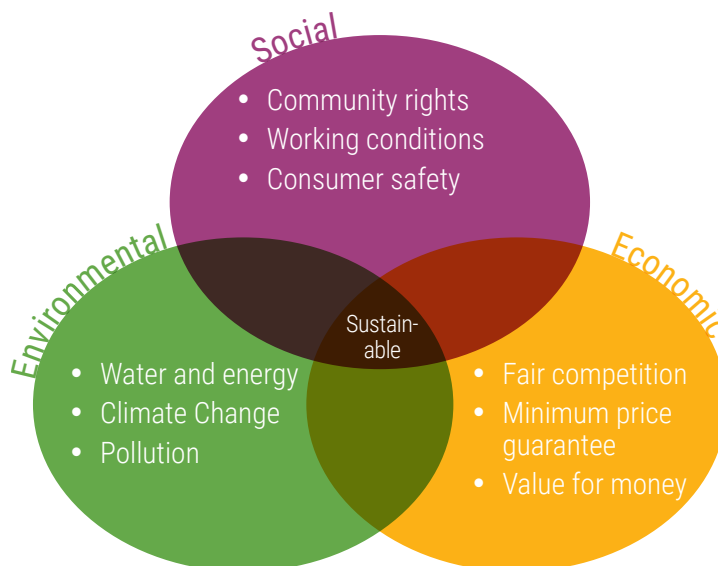


Figure 8: The three dimensions of sustainability including examples of potential indicators (non-exhaustive list)

¹⁴ An overview on existing sustainability standards can be gained via ITC Standards Map: <http://www.standardsmap.org/> (ITC n.d.)

¹⁵ Single score: multiple scores for sustainability aspects are aggregated into one number.

Guiding Questions

- Do you communicate aspects of more than one dimension through your claim?
- When claiming ‘overall sustainability’ of a product, do you address hotspots in all sustainability dimensions, so that burden shifting is avoided? Do consumers receive sufficient information that enables them to understand why the product is sustainable (i.e. covering all dimensions)?
- Is a combination of complementary claims feasible – i.e. do they fit together (e.g. in terms of scope) and support consumers’ understanding of the claim?

Box 16: Product Sustainability Assessment: A challenging task

Addressing the relevant aspects of sustainability in all three dimensions is a challenging task, especially if the provider of information aims to cover the entire life cycle of a product. The maturity of available tools and methodologies to assess social, economic and environmental impacts varies – with the highest level of maturity in the environmental dimension. To date, there are no internationally recognized standards or labels that cover all three aspects over the full life cycle. A combination of standards and methodologies is already practiced to fill gaps or convey information along the value chain (Chkanikova and Kogg 2015).

Further reading:

1. Towards a life cycle sustainability assessment (UN Environment/SETAC 2011)
2. Guidelines for Social Life Cycle Assessment of Products (Benoît et al. 2009)
3. Handbook for Product Social Impact Assessment (Fontes et al. 2016)
4. Databases (n.b. not all freely available): Social Hotspots Database (SHDB)*, PSILCA[†]

* www.socialhotspot.org

[†] www.psilca.net

Table 9: Example for a sourcing standard covering three dimensions of sustainability


Product: Paper	Do
Claim	
Discussion	<p>The FSC® (Forest Stewardship Council®) certification system covers the three dimensions of sustainability at the forest management level of supply chains. It is one of the few examples that raises criteria for environmental, social and economic issues and communicates this to consumers.</p> <p>Claims related to FSC labels do not cover all production stages, since the label is focused on the forest level and then gives assurance that certified or controlled materials are kept separate from other materials throughout the supply chain. Therefore, information providers need to consider other means to cover all sustainability dimensions at later stages in the supply chain in order to fulfill the principle of relevance. E.g. in the case of copy paper, FSC ensures sustainable practices in the originating forest, but significant greenhouse gas emissions can occur in the final manufacturing process - also worker's health and safety can be affected in the manufacturing stage. However, in line with the principle of clarity, the FSC label is clear and transparent on the limits of the claim by adding: "From well-managed forests".</p> <p>Note: There are in total three labels, but for the illustration of this example, this one was selected.</p>



Table 10: Example of a standard for a service covering three dimensions of sustainability


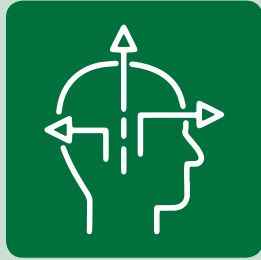
Product: Accommodation	Do
Claim	
Discussion	<p>The Fair Trade Tourism certification raises a set of social, economic and environmental criteria for the following issues:</p> <ul style="list-style-type: none"> • Business practice and human resources • Community resources • Cultural heritage • Environmental practice <p>The criteria are partly required and partly voluntary. Certification is based on online assessments, followed by onsite audits by an independent third party auditing firm.</p> <p>The Fair Trade Tourism scheme follows a management based approach and e.g. requires evaluation of and measures for relevant local issues. The owners of the labelling programme provide a consumer information toolkit to support users of the label to engage consumers. More info: www.fairtrade.travel/Downloads.</p>

Table 11: Example for combining complementary claims

Product: Coffee	Do	
Combined Claim		
Discussion	<p>In the coffee sector, it is common practice to combine complementary certification schemes and communicate this to consumers. In 2009, 42% of Fairtrade sales were combined with organic certification (ITC 2011): Fairtrade certification to improve the social and economic sustainability attributes, and an organic standard to help address the environmental sustainability attributes of a product and communicate this to consumers.</p> <p>This approach helps consumers to better understand where improvements have been made (namely in fair remuneration of workers and more environmentally friendly production patterns). This can provide more clarity (Principle 3) than only using an abstract sustainability claim.</p>	

PRINCIPLE 7

BEHAVIOUR CHANGE AND LONGER TERM IMPACTS



From information to action

- Encourage consumers to act during the purchase, re/use and disposal of products in order to reduce adverse effects on the environment or society
- Implement engagement processes that secure longer-term relationships with consumers to better understand their behaviour and information needs – for your own improvement and to develop educational content for sustainability, based around their lives and society
- Embed the sustainability information into a wider context and support the sustainability knowledge of consumers

Even consumers who are willing to change their consumption behaviour in a positive way are easily distracted from doing so (the 'attitude-behaviour' or 'value-action' gap). Using behavioural insights to find the most effective interventions or levers for change can help lead consumers towards more sustainable consumption patterns and can not only benefit the environment and society but also evoke feelings of success and improved consumer experience.

The sustainability claim **should** go beyond simply informing consumers, to **actively encouraging** them to adopt more **sustainable consumption patterns**. A claim **should define what the consumer can do to reduce negative sustainability impacts** (through purchase, use, re-use or disposal).

For the change of behaviour to be sustained and not only be adopted short-term or for a one-time decision, a **longer-term relationship should be built with the consumer** to embed new consumption behaviour. The success and impact of **behaviour change should be monitored**, and the **product sustainability information should be adapted** according to the results. The sustainability information **should support the education of consumers for them to better understand and act on sustainability issues**.

Guiding Questions:

- Were consumer interests identified beforehand? Are topics that matter to consumers addressed?
- Is concise guidance provided to consumers so they know how they can take action? Are they merely informed how, or are they encouraged to actively do so?
- Do default options (e.g. pre-set energy saving mode for appliances) support sustainable behaviour?
- Are potential/ actual impacts of behaviour change communicated? Are they tangible? Do consumers receive feedback on the positive impact that results from their changed behaviour? (e.g. statistics on emissions reductions because of using the product in a certain way)
- Are behaviour changes monitored? Are changes in the way the sustainability information is provided planned accordingly?
- Is a long-term communication relationship built or planned with the consumer?
- Do you embed your product sustainability information into a wider context? And does this information help consumers to better understand their role in reducing potential negative impacts?

Box 17: About Nudging for Good

Nudging is a concept from behavioural science which aims to guide people's behaviour in a positive way without restricting choice. It addresses the fact that consumers do not act rationally, but are affected by habits, routines, time and convenience. Small adjustments in information provision can make a difference to the way consumers behave. This can be achieved by simplified information or by presenting default choices that facilitates socially desirable decisions (e.g. duplex printing is the default option for a printer). Nudges can be regarded as an enabler for decision making that is beneficial for society and usually in the individual's long-term interests (e.g. by saving printing paper).

The concept is increasingly tested and applied by governments* and brands† in various areas, including sustainable consumption.

Principles of Nudging for Good[^]


- All nudging should be transparent and never misleading.
- It should be as easy as possible to opt out of the nudge, preferably with as little as one mouse click.
- There should be good reason to believe that the behaviour being encouraged will improve the welfare of those being nudged.

* The Behavioural Insights Team: <http://www.behaviouralinsights.co.uk>

† AIM – European Brands Association: <http://www.nudgingforgood.com>

[^] Richard H. Thaler: http://www.nytimes.com/2015/11/01/upshot/the-power-of-nudges-for-good-and-bad.html?_r=0

Table 12: Example for changing behaviour of consumers with product information

Product: Washing detergent	Do
Claim	 <p><i>*with courtesy of Procter & Gamble</i></p>
Discussion	<p>Ariel succeeded to help increase the number of consumers that wash their laundry loads at lower temperatures and address the most important environmental hotspot of washing detergents. Ariel introduced the “Turn to 30°” campaign and conveyed the message that their reformulated product is as effective as with usually applied washing temperatures 40° - 60°. This was achieved by making the message easy to understand and available through many touch points (online, media, advertising, on-pack), including at the time when it can most effectively affect the consumer behaviour, namely when loading the washing machine. The effectiveness of the campaign was supported by a consumer survey, which showed that in five years 15% of Ariel consumers adapted to wash at 30°.*</p> <p>* The case study is part of the Nudging for Good initiative and available online: http://www.nudgingforgood.com/2015/06/05/how-ariel-make-consumers-saving-energy-by-switching-from-40-or-60-to-30-pg/</p>

Box 18: Sustainable products: From niche to mainstream

In the past, marketing of sustainable products mainly targeted an audience of pro-sustainable consumers (segmented as innovators or early adopters), who are already well informed on environmental or social product impacts. However, marketers (Bennet and Williams 2011) and researchers (Barber et al. 2016) suggest to promote sustainable products as the norm (not the ‘exception’) and thereby widen the number of sustainable conscious consumers.

A proposed measure is to provide comparative feedback on what other consumers are doing, like average energy consumption in comparable households on the energy bill or the percentage of consumers purchasing eco-labelled products in their everyday shopping. A focus should also be placed on personal benefits such as product quality and health. Consumers can also be rewarded for more sustainable behaviour, for example through sustainability-oriented payback/bonus systems, e.g. Korea’s Green Credit Card.*

* Green Credit Card is an economic incentive scheme that provides economic rewards to credit card users for purchasing low-carbon and eco-friendly products, using public transport; and saving utility rates including electricity, water, and gas. More information: <http://eng.me.go.kr/eng/web/index.do?menuId=169>

PRINCIPLE 8

MULTI-CHANNEL AND INNOVATIVE APPROACH



Engage with consumers in diverse ways

- Address consumers where they need the information
- Creatively remind and inspire consumers how they can act more sustainably – don't bore them
- Use a combination of different communication approaches


Consumers are faced with a plethora of information when making product purchase, usage and end-of-life decisions. Further, patterns of consumer information and product purchase are shifting away from traditional ways towards web-based e-commerce and information platforms. To get consumers' attention in the first place and to do so in the right place/situation, using a single/stand-alone communication channel may not be enough to elicit behaviour change.

The sustainability claim **should** be provided using a **multi-media approach**, addressing consumers through different and innovative communication channels in different situations. The information **should** be **complementary** and not redundant, and **should not overload** the consumer. And, where feasible, the information **should be entertaining to raise attention**.

Guiding Questions:

- Do consumers have the possibility to interact (with each other or the information provider)?
- Are different information channels provided, that address different user groups? Can the channels be used differently to access the various consumer types to reinforce, repeat and amplify the product sustainability information and support behaviour change? Is the consumer also addressed in a humorous or entertaining way rather than just being educated?

Table 13: Example of a multi-channel campaign

Product: Vegetables and fruits	Do
Claim	
Discussion	<p>Intermarché, the third largest supermarket chain in France, launched a comprehensive campaign using marketing, advertising, social media, store rebrands, and others, to reduce food waste. The objective was to convince consumers that un-calibrated (non-standardised) fruits and vegetables are just as tasty and that there is no need to avoid them.</p> <ol style="list-style-type: none"> 1. General information: local campaign with print and press release 2. Communication via price: selling of un-calibrated fruits and vegetables which do not enter the market with a 30% discount 3. At point of sale: extra-aisle, labelling ('inglorious' label) and own spot on sale receipt 4. Product sampling: free testing of juices and soups made from uncalibrated fruits 5. Extension to a national campaign (at 1800 stores) and increased media appearance (TV-spots, social media, etc.) <p>The campaign addressed the consumer in different ways and situations and helped to reduce the negative impact caused by food waste. It used humour to open up a market for previously non-marketable products. Launched in 2014, the campaign claimed responsibility for a 24% increase in overall store traffic and a 300% increase in references of Intermarché on social networks during its first week.* It won at the Positive Change Effie Awards 2015,† and five main competitors soon launched similar offers.</p> <p>* See http://itm.marcelww.com/inglorious/ † Further information on the positive change award: https://effie.org/award_program/partner/positive-change</p>

PRINCIPLE 9

COLLABORATION



Work with others to increase acceptance and credibility

- Involve a wider group of actors (e.g. value chain partners, trade association members, NGOs) to jointly develop the basis for your sustainability claims
- Let other stakeholders participate and thereby improve the overall public acceptance and trust of your claims by consumers
- Inspire behaviour change through an inclusive language: let the consumer feel s/he is not alone but part of a (large) group or movement

Collaborative approaches can increase acceptance and credibility of product sustainability information among consumers and other stakeholders. Collaboration can also lead to improvements in the quality of the underlying evidence that supports the claims; cost-savings in both evidence gathering and communication; harmonisation of claims (making it easier for the claim provider and the consumer); and increased efficiency and impact. For instance, when conducting a hotspots analysis, collaboration at the sector or product level, with peers and other key stakeholders, is an important element in ensuring the credibility and robustness of the derived information.¹⁶ For third party verified communication (e.g. labels), collaboration within and between value chain actors is common practice.

Multi-stakeholder consultations should be an integral part of the development of sustainability information. The development process **should be open and inclusive**. The **opportunities for stakeholder involvement should be clearly communicated**.

In particular, consumers themselves **should be invited and encouraged to feel part of a joint effort**. The product sustainability information (language, pictures, etc.) **should be inclusive**.

Stakeholder engagement should be continued after the sustainability claim has been issued to enhance evaluation and adaptive measures as required. **Joint communication channels should be used** to help build trust, consistency and understanding of the claim.

¹⁶ Examples for collaborative hot spots approaches is the work by: The Sustainability Consortium (TSC) www.sustainabilityconsortium.org, European Commission Environmental Footprint (European Commission 2013), WRAP Product Sustainability Forum <http://www.wrap.org.uk/content/product-sustainability-forum>

Guiding Questions:

- Have you considered existing voluntary sustainability standards (use for example ITC's Standards Map to review criteria and potential application to your needs)?
- Are relevant stakeholders (partners) identified, contacted and involved in evidence gathering and development of the sustainability information? Does this include experts in the field and users (consumers) of the product? Where relevant, has a good mix of private, public and civil society stakeholders been approached?
- Is information on how to join or follow processes related to the claim development easily accessible? Are participation options clearly communicated? Are the barriers for involvement low?
- Is a follow-up process with the stakeholder group in place to assess the claim's effectiveness?
- Is the sustainability information (language, pictures, etc.) inclusive so that the consumer feels part of a group that is changing behaviour?

Table 14: Example for a collaborative approach to develop methodology for environmental claims

Product: Cross-sectoral	Do
Methodology	Product Environmental Footprint (PEF) and Organisation Environmental Footprint (OEF)
Discussion	<p>In 2013 the European Commission introduced the PEF Guide, a method to assess and communicate the environmental performance of products and organizations. Pilot testing of the PEF method has been running from 2013-2017, involving more than 1000 stakeholders from:</p> <ul style="list-style-type: none"> • industry, • retail sector, • environmental NGOs, • academia, and • policy makers. <p>The development process of agreeing on product category or specific sector rules includes virtual and face to face consultations open to the public, helping to make it inclusive and transparent. Consumer testing is also part of the process to assess the effectiveness of different product-related consumer information methods, beyond just product labelling. The initiative is a collaborative approach with a variety of different stakeholders, including market competitors, to ensure that relevant perspectives are included to achieve a robust methodology.</p> <p>The PEF pilots are expected to be finalised end of 2017 while no decision has yet been made in terms of any potential policy application.</p>

PRINCIPLE 10

COMPARABILITY



Help consumers choose between similar products

- Use product comparisons only where it really helps the consumer to make sustainable choices
- Make sure that product comparisons are based on very strict and objective rules relevant to the specific product, such as product category rules
- Participate in relevant government-led or third party initiatives, or industry/sector collaborative approaches, to develop constructive comparability

To compare similar products based on their sustainability performance and communicate this to consumers is a complex issue and not necessarily feasible for all product categories.¹⁷ There are also jurisdictions where comparative advertising is strictly regulated (e.g. in the European Union). However, product comparison can also be a powerful tool for consumers to make more sustainable choices. Government plays a key role to initiate policies, programmes or third party schemes that provide agreed benchmarks and methodologies for meaningful product comparisons. Private sector-driven initiatives bare the risk of not being regarded impartial by consumers or other stakeholders.

Information providers **should carefully assess whether they are able to issue a claim that has the methodological,¹⁸ evidential and legal basis** to allow consumers to directly compare one product to a similar product, or the market average/leader. They **should also consider whether a product comparison helps consumers to make a more sustainable choice; and/or participate in approaches to define and develop comparability criteria**, led by government or third parties, including industry networks. Comparisons **should be based on quantitative or semi-quantitative data** and adhere to **benchmarks and methodologies** provided by **governments or third party stakeholders**.

In any case, more **specific guidance must be followed**, which goes beyond the scope of these Guidelines.¹⁹

¹⁷ In the context of the Building the Single Market for Green Products initiative (European Commission 2013b) between 2013 and 2017 the European Commission is testing the feasibility of comparing products on the basis of their environmental footprint by defining specific Product Environmental Footprint Category Rules (PEFCRs) (European Commission 2013).

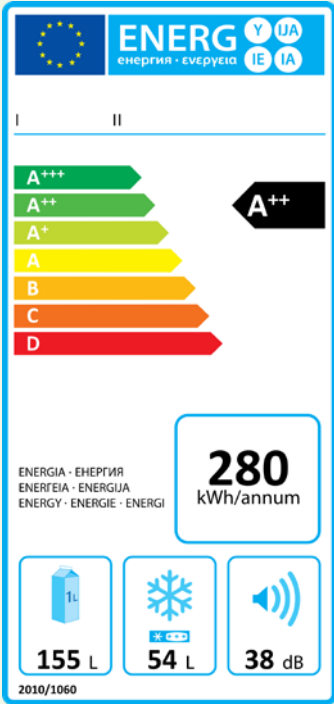
¹⁸ Includes: consistency of the methodology, data, definition and indicators

¹⁹ Additional guidance for product comparisons: ISO 14025 Type III environmental declarations (ISO 2006b), ISO 14040 Life cycle assessment - Principles and framework (ISO 2006a), ISO/DIS 14026 Principles, requirements and guidelines for communication of footprint information (ISO 2016b), Compliance Criteria on Environmental Claims (MDEC 2016); for household appliance sector: work by AHAM <http://www.aham.org>

Guiding Questions:

- Are there government or third-party led initiatives in which you can participate and on which you can base your product comparison?
- Does the selected methodology underlying the claim explicitly cover guidance to product comparisons? Are those guidance principles entirely fulfilled and backed up by a review of a third party (e.g. a critical review)? Is the entire life cycle of the product considered and important stages such as product use and disposal not omitted?

Table 15: Example for product comparison

Product: Refrigerator	Do
Claim	 <p>The image shows a standard European energy label for a refrigerator. At the top, it features the EU flag and the word 'ENERG' with 'енергия · енеруєт' below it, and energy efficiency icons Y, UA, IE, IA. The label is divided into two columns, I and II. Column I shows a vertical scale of energy classes from A+++ (green) to D (red), with a black arrow pointing to the A++ class. Column II shows the absolute annual energy consumption of 280 kWh/annum. Below the energy class, there are three icons: a water tap for volume (155 L), a snowflake for freezer volume (54 L), and a speaker for noise level (38 dB). The label also includes the text 'ENERGIA - ЕНЕРГИЯ', 'ENERFEIA - ENERGIJA', 'ENERGY · ENERGIE · ENERGI' and the reference number '2010/1060'.</p>
Discussion	<p>The energy class rating (from A+++ to D) is a relative rating scheme and helps the consumer compare refrigerators within a similar product class based on refrigerator volume. The absolute annual consumption figure supports consumers which are intending to identify the appliance with lowest overall energy use. The energy label is based on a credible system defined by the Commission Delegated Regulation (EU) No 1060/2010 supplementing Directive 2010/30/EU (European Commission 2010).</p>

OTHER GUIDANCE DOCUMENTS

The following chart provides an overview of other existing guidance documents that were considered in the development of the Guidelines.

A Members Guide to GENICES (GEN 2016)
A practical guide to environmental claims for traders and consumers (French government 2012)
A Review of Public Policies relating to the Use of Environmental Labelling and Information Schemes (ELIS) (Klintman 2016)
Building demand for sustainable commodities (ISEAL 2015b)
Claims or fair eco-advertising in practice (CENIA 2010)
Code of Advertising and Marketing (ICC 2011)
Communicating hotspots: The effective use of sustainability information to drive action and improve performance (UN Environment, 2017)
Compliance Criteria on Environmental Claims (MDEC 2016)
Consumer market study on environmental claims for non-food products (European Commission 2015)
Eco-promising: communicating the environmental credentials of your products and services (BSR and Forum for the Future 2008)
Environmental and Ethical Claims in Marketing (The Consumer Ombudsman Norway 2009)
Environmental Footprint Guide Communication Guidance (European Commission 2014)
Five Universal Truths Challenge the label (ISEAL 2015c)
Green Claims Guide (DEFRA 2011)
Guidance from the Consumer Ombudsman on the use of environmental and ethical claims, etc., in marketing (Danish Consumer Ombudsman 2014)
Guidance on the application of the Unfair Commercial Practices Directive (European Commission 2016)
Guidelines to Assess Environmental Performance Standards and Ecolabels for Federal Procurement (United States Environmental Protection Agency 2016)
ISEAL Credibility Principles (ISEAL 2013)
ISO 14020: Environmental labels and declarations – General Principles (ISO 2000)
ISO 14021: Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling) (ISO 2016a)
ISO 14024: Environmental labels and declarations – Type I environmental labelling – Principles and procedures (ISO 1999)
Mainstream Green: Moving sustainability from niche to normal (Bennet and Williams 2011)
Product Sustainability information State of play and way forward (UN Environment 2015) (Overview on product sustainability information, no guidelines)
Recommendations of Specifications, Standards, and Ecolabels (United States Environmental Protection Agency 2018)
Recommendation on the use of common methods to measure and communicate the life cycle environmental performance of products and organisations (European Commission 2013)
UN Guidelines for Consumer Protection (United Nations 2003)

GLOSSARY

Term	Definition
Accreditation	Formal recognition by an independent body to confirm that a certification (->) body operates according to international standards.
Certification	Procedure by which an accredited (->) independent body provides written assurance (a certificate) confirming that the requirements of a standard (->) (e.g. for eco-labelling) are met.
Consumer	A person purchasing, using and/or disposing of goods and services for private or commercial purpose (i.e. includes individuals in a private sector supply/ value chain or public procurement process).
Greenwashing	Derived from the term “whitewashing”. An attempt to mislead consumers by marketing products as more environmentally friendly than they really are. Even though “green” relates to environmental claims, the expression is sometimes also used in the context of social and ethical product information.
Hotspots	The most significant economic, environmental, and social impacts or benefits associated with a specific country, industrial sector, organization, product portfolio, product category or individual good or service. I.e. a stage in a product’s life cycle which yields the greatest sustainability benefits or negative impacts.
Hotspots Analysis	A methodological framework for the rapid assimilation and analysis of a range of information sources, including life cycle based studies, market and scientific research, expert opinion and stakeholder concerns. Its outputs are used to identify solutions and prioritize actions, often as a pre-cursor to developing more detailed or granular sustainability information.
Information Provider	An information provider is the organisation or body that conveys the product sustainability information to consumers.
Intermediate product	An output in a production process that is the input to other production processes and that requires further transformation before it becomes a product (->) to be sold and used.
Life cycle	The complete life of a product (->), from raw material extraction, through consumer use to ‘end of life’ disposal.
Life Cycle Assessment	A method for the compilation and evaluation of inputs, outputs and potential environmental, social and economic impacts of a product system throughout its life cycle (->). ISO 14040 (ISO 2006a) defines the methodology for an environmental life cycle assessment.
Life Cycle Thinking	The consideration of risks and opportunities associated with a product system (->) from raw material extraction to final ‘end of life’ disposal.

Nudging	Encouraging consumer behaviour in a specific direction through information, choice options and context. "A Nudge is any aspect of the choice architecture that alters people's behaviour in a predictable way without forbidding any options or significantly changing their economic incentives." (Richard Thaler, Cass Sunstein, Nudge - Improving decisions about health, wealth and happiness, 2008)
Product	Refers to any good or service. E.g. food (good), transport (service), providing accommodation (service), paper (good).
Product System	A product (->) and how it can be purchased is only one part of a product system, which includes upstream (e.g. cultivation of crops) and downstream (e.g. recycling) processes.
Product Sustainability Information	<p>A range of tools and systems that seek to guide consumers to make more sustainable choices about goods and services (products), including in their use and end of life phase.</p> <p>These include ecolabels, voluntary standards, product declarations, ratings, marketing claims, footprinting, life-cycle assessments (->) and other ways of communicating with consumers on environmental, (socio) economic and social issues. They can be single- or multi-issue, and may follow a life cycle approach to provide a holistic perspective considering the impacts of every stage of the product life, including how a product is used and how it is treated responsibly at end-of-life.</p>
Standard	A document that provides, for common and repeated use, rules, guidelines or characteristics for products or related processes and production methods, with which compliance is not mandatory.
Sustainable/ Sustainability	<p>Addresses the environmental, economic and social dimensions. Compared to the average, benefits of more sustainable products could include:</p> <ul style="list-style-type: none"> • a reduced negative impact on society (or beneficial to society) by reducing environmental and/or social impacts • less harmful to the environment and human health • a positive economic impact <p>For example, a more sustainable banana may:</p> <ul style="list-style-type: none"> • provide fair payment to a plantation worker • use non-toxic pest management practices, and therefore not be harmful to the workers, consumers and the environment alike • be profitable for all partners of the value chain and the final seller
Verification	Procedure by which a second or third party (not a certified body) provides assurance that the requirements of a standard (e.g. for self-declared claims) or other predetermined criteria are met.

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RECOGNITIONS

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Anthesis Group	www.anthesisgroup.com/
Betterfly Tourism International	www.betterfly-tourism.com/
Association for Soaps, Detergents and Maintenance Products (A.I.S.E.)	www.aise.eu
European Brands Association (AIM)	www.aim.be
Akatu Institute	www.akatu.org.br
Caribbean Consumer Council (CCC)	
Centre for Responsible Business (CRB)	www.c4rb.org/
Centro Tecnológico para la Sustentabilidad, Argentina	www.cts.fra.utn.edu.ar
Consumer Education Trust (Consent), Uganda	www.consumersinternational.org/members/members/consumer-education-trust-consent/
Consumers International (CI)	www.consumersinternational.org
Department for Environment, Food and Rural Affairs (DEFRA), United Kingdom	www.gov.uk/government/organisations/department-for-environment-food-rural-affairs
European Commission, Directorate-General for Environment	www.ec.europa.eu/dgs/environment
European Policy Centre (CEP)	www.epc.eu
Federal Ministry for the Environment, Nature Conservation, Building and Nuclear Safety (BMUB), Germany	www.bmub.bund.de/en/
GEDnet – Global Environmental Declarations Network	www.gednet.org
Global Ecolabelling Network (GEN)	www.globalecolabelling.net
Global Standards 1 (GS1)	www.gs1.org
Green Purchasing Network (GPN), Japan	www.gpn.jp/english
HEJSupport	www.hej-support.org

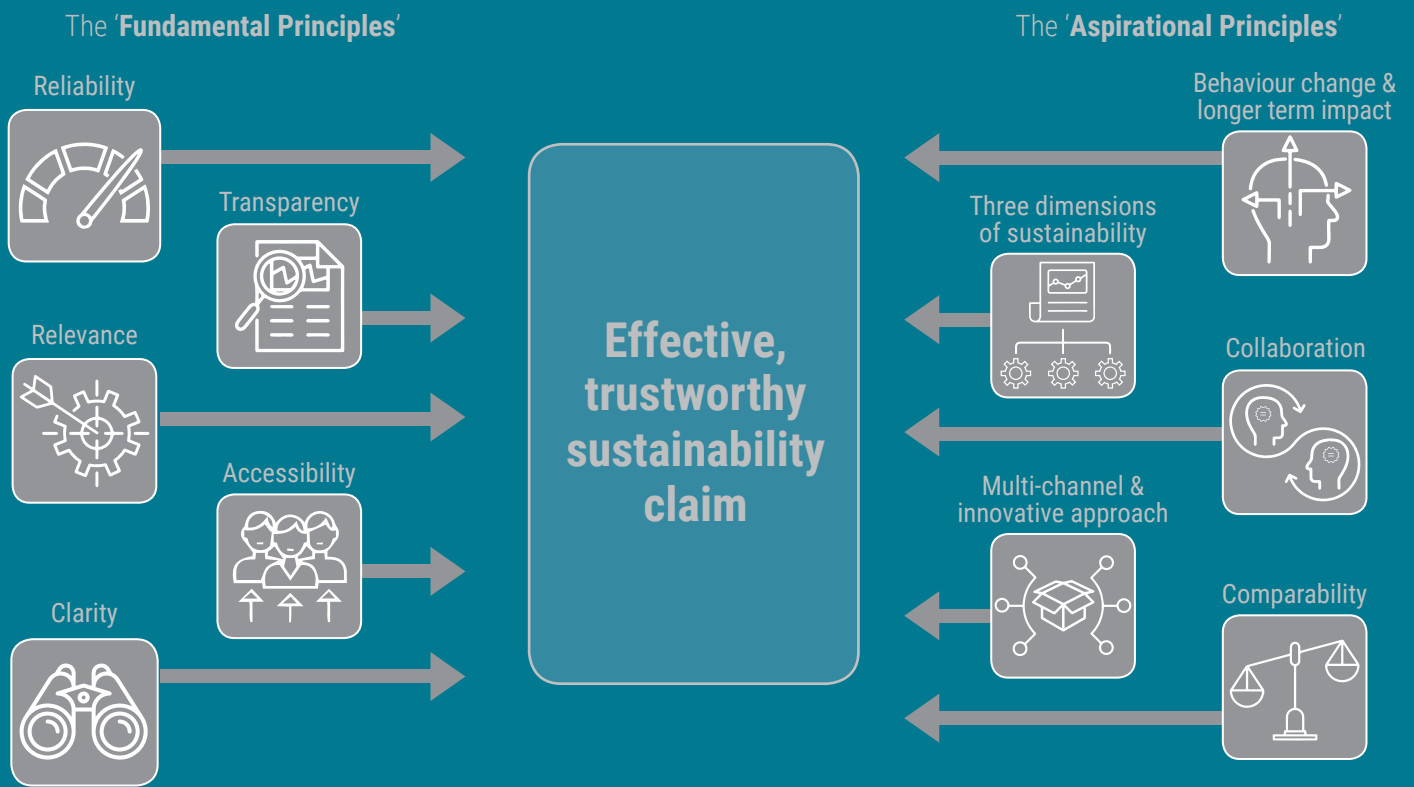
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International Network of Product Sustainability Initiatives (INPSI)	www.wrap.org.uk/content/international-product-sustainability-network
International POPs Elimination Network (IPEN)	www.ipen.org
ISEAL Alliance	www.isealalliance.org
LAC Footprint Initiative, CICOMER	www.lac-footprint.com
Life Cycle Initiative (LCI)	www.lifecycleinitiative.org
L'Oréal	www.loreal.com
Microsoft	www.microsoft.com
Ministry of Environment, Peru	www.minam.gob.pe
Ministry for Ecological and Solidary Transition, France	www.ecologique-solidaire.gouv.fr/
Ministry of Environment and Forestry, Indonesia	www.menlh.go.id/
Ministry of Environment, Jordan	www.moenv.gov.jo/En/Pages/default.aspx
Organización de Consumidores y Usuarios (OCU)	www.ocu.org
Product Environmental Footprint (PEF) World Forum	www.pef-world-forum.org
The County Administrative Board of Östergötland, Sweden	www.lansstyrelsen.se/Ostergotland/En
The Sustainability Consortium (TSC)	www.sustainabilityconsortium.org
WRAP	www.wrap.org.uk/
WWF-Indonesia	www.wwf.or.id/
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The *Guidelines for Providing Product Sustainability Information* offer value chain and public sector professionals clear guidance on making effective, trustworthy claims to consumers, on product-related sustainability information. They are applicable to all regions and companies of all sizes. A long term objective is to create a level playing field for developing new, and revising existing, product sustainability information.

Ultimately, *the Guidelines* aim to empower consumers to make informed sustainable choices on product choice, usage and disposal.

The Guidelines establish minimum requirements that must be met (Fundamental principles); and encourage ambition, improvement and sustainability leadership over time (Aspirational principles). Associated guidance walks the user through improving their consumer communications.

The Guidelines' focus is on the information provided to consumers. This does not imply that the sole responsibility to reduce the adverse effects of product manufacturing and consumption on society and the environment lies with consumers. Sustainable consumption and production can only be achieved if all value chain stakeholders play their part and commit to more environmentally and socially sound actions.