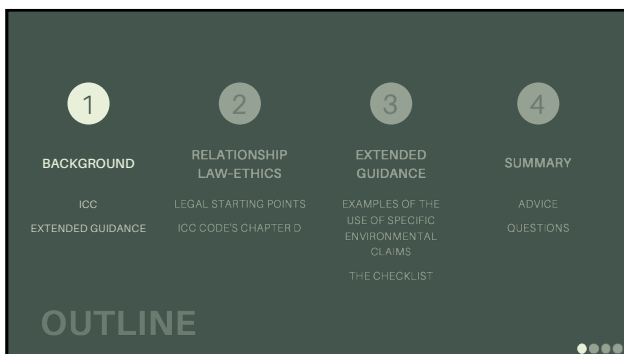
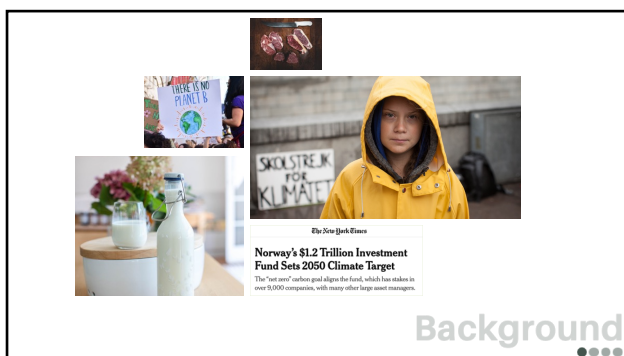




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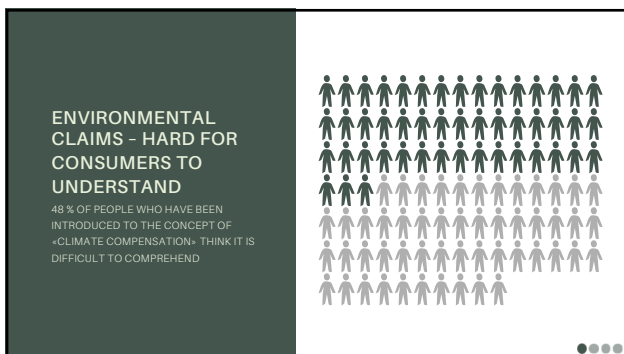
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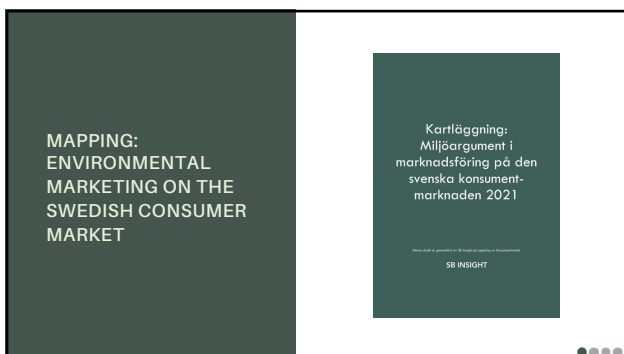
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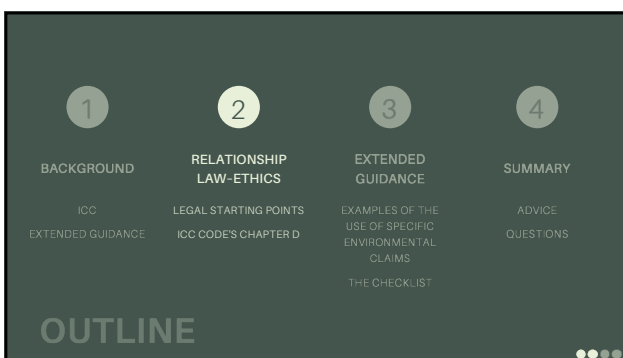
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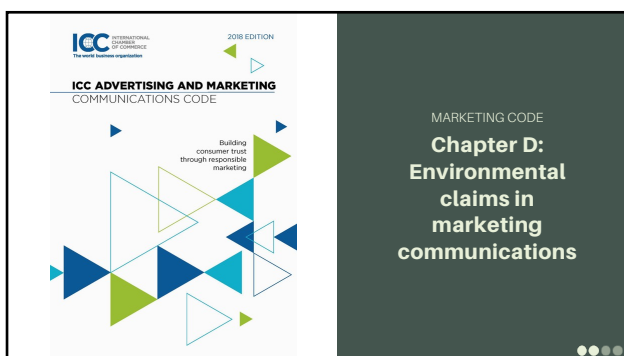
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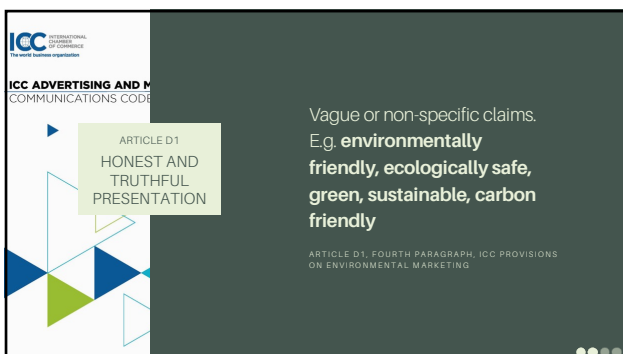
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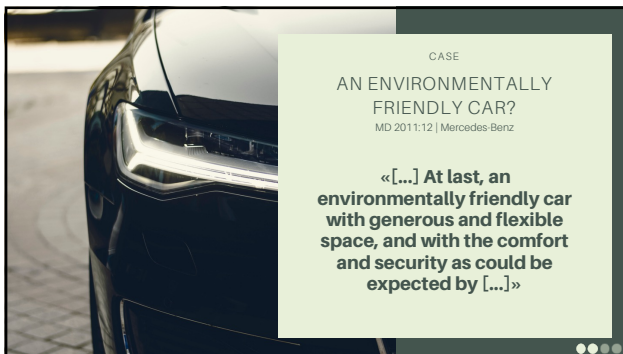
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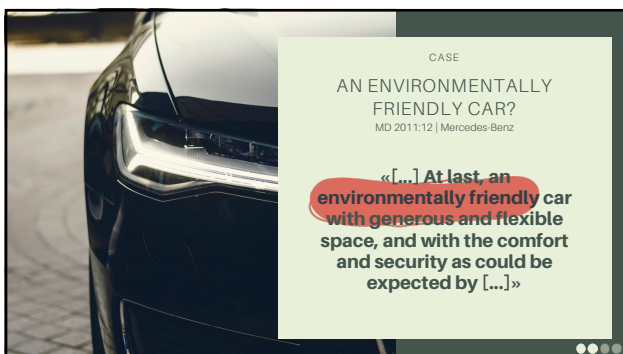
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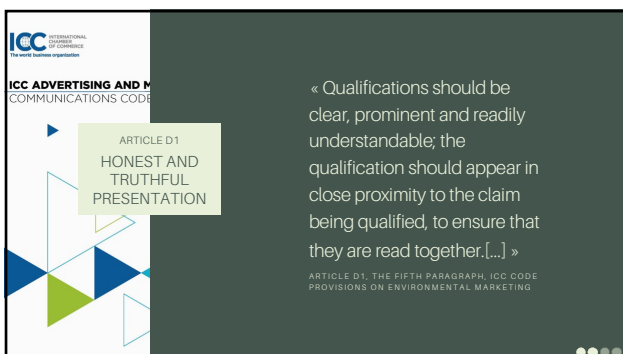
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«Hunton Nativo Wood Fiber Insulation board is a natural and environmentally friendly insulation [...]»

«By using Hunton Nativo Wood Fiber you contribute to reducing emissions of CO2 and other greenhouse gases. The boards are produced from sustainable forestry and are 100 % recyclable.»

THE POSITIVE FORCE OF WOOD-BASED INSULATION
PMT 13193-20 | Swedisol / Hunton

28

«Hunton Nativo Wood Fiber Insulation board is a natural and environmentally friendly insulation [...]»

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THE POSITIVE FORCE OF WOOD-BASED INSULATION
PMT 13193-20 | Swedisol / Hunton

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ICC INTERNATIONAL CONFEDERATION OF COMMERCIAL RELATIONS
The world's business organization

ICC ADVERTISING AND MARKETING COMMUNICATIONS CODE

ARTICLE D3
SUPERIORITY &
COMPARATIVE
CLAIMS

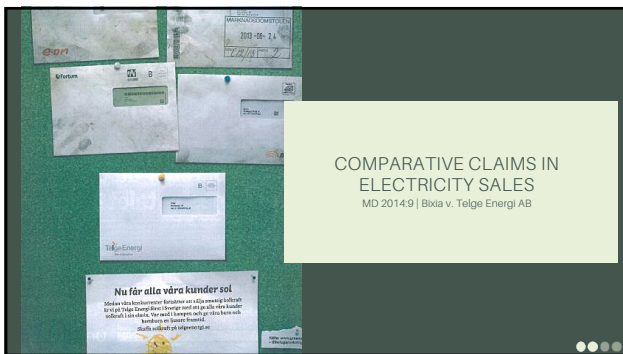
«Any comparative claim should be specific and the basis for the comparison should be clear. Environmental superiority over competitors should be claimed only when a significant advantage can be demonstrated. [...]»

ARTICLE D9, THE FIRST PARAGRAPH, ICC CODE PROVISIONS ON ENVIRONMENTAL MARKETING

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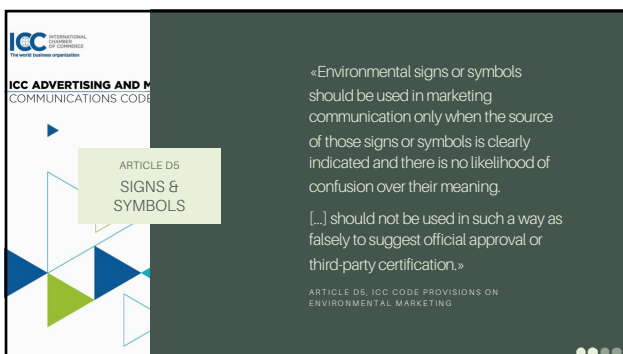
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ENVIRONMENTAL LABELS

DIFFICULT TO UNDERSTAND - BUT CONSUMERS TRUST THEM

ONLY 36% OF CONSUMERS FIND IT EASY TO UNDERSTAND THE MEANING OF DIFFERENT LABELS.

AT THE SAME TIME, 71 % TRUST THAT THE PRODUCTS WITH ECO LABELS/certifications meet the required criteria.

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ARTICLE D6
WASTE
HANDLING

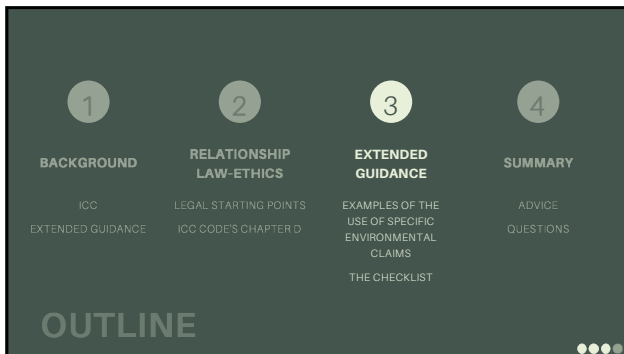
«Environmental claims referring to waste handling are acceptable provided that the recommended method of separation, collection, processing or disposal is generally accepted or conveniently available to a reasonable proportion of consumers in the area concerned (or such other standard as may be defined by applicable local law). If not, the extent of availability should be accurately described.»

ARTICLE D6, ICG CODE PROVISIONS ON ENVIRONMENTAL MARKETING

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100%
RECYCLABLE

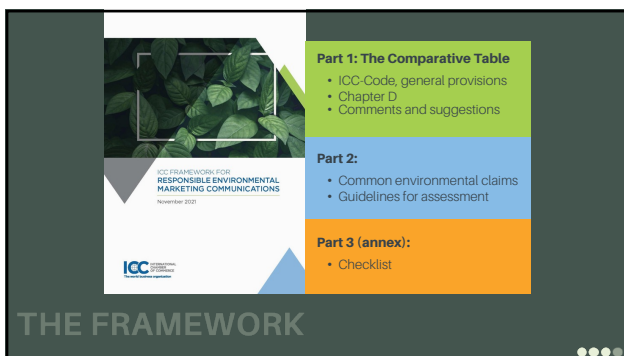
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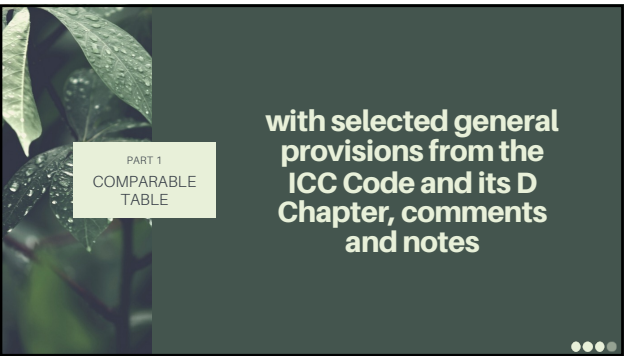
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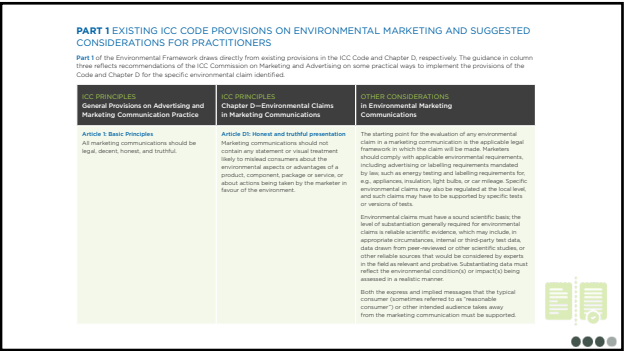
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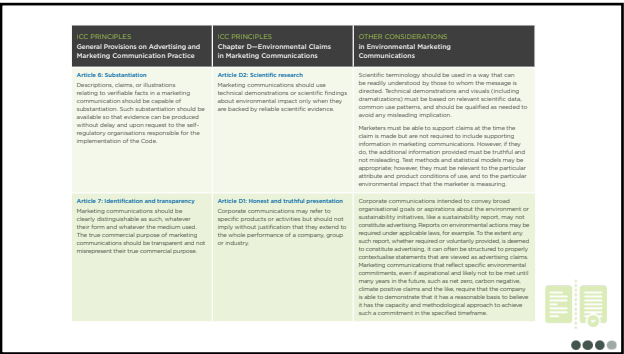
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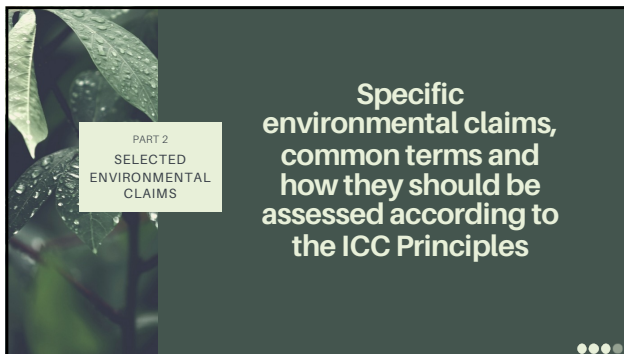
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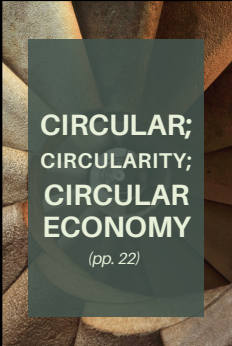
SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications	APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications
<p>Carbon Footprint, Carbon Offset, Carbon Neutral, Carbon Negative, Net Zero, Climate Positive</p> <p>"Carbon" is a characteristic of greenhouse gas emissions. While carbon dioxide (CO₂) is by far the main greenhouse gas (GHG) contributing to climate change, other greenhouse gases (e.g., methane, nitrous oxide, and a variety of fluorinated gases (generally (PFCs, HFCs, hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF₆) and halons)) are widely recognized to also contribute to global temperature increase. The impact on the climate of GHG emissions in total may be measured as CO₂ equivalents. All human activity will potentially involve the release of greenhouse gases that drive global temperature increase.</p> <p>A "carbon footprint" is a way of reporting the impact on climate change from a product, service, or company's business operations. A full assessment would evaluate all aspects, from raw material extraction and processing to actual use and product end-of-life (commonly known as "cradle to grave"), of all GHG gases.</p>	<p>General</p> <p>Claims about the benefits of carbon dioxide or GHG reduction actions should clearly specify whether the claim involves actions to reduce CO₂ emissions only or all GHGs and, if the claim applies to only portions of the product's life cycle, which portions. Marketers must substantiate all claims of the measures taken to limit, reduce or offset CO₂ or CO₂ equivalent contributions using a reliable scientific method. Qualifiers may be required to avoid consumer misconception that a carbon reduction or other carbon related claim implies a broader benefit to the environment or to climate goals than is supported by the applicable scientific evidence. Providing access to the actual substantiating information may increase confidence in the validity of such claims.</p> <p>Marketers must substantiate all claims of the measures taken to limit, reduce or offset CO₂ or CO₂ equivalent contributions using a reliable scientific method.</p> <p>Company/product/service claims</p> <p>Marketers should specify if a claim relates to a product, component, package, service or company's business processes or operations.</p>

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CLARIFYING IS NECESSARY REGARDING:

- If it concerns CO₂-reduction or a reduction of other greenhouse gases
- If the claim is about a product, packaging or an organisation
- Whether vision goals are realistically achievable or not
- That «net-zero»/«climate neutral» in practice means climate-compensation


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**CIRCULAR;
CIRCULARITY;
CIRCULAR
ECONOMY**
(pp. 22)

- Reduced carbon footprint through sharing, leasing, reuse, repair, refurbishment and recycling
- Lacks global definition. Risk overuse.
- Terms tied to circular economy or life-cycle must be assessed carefully. The marketer must provide clear definitions and qualifications. The claim must be based on scientific data.

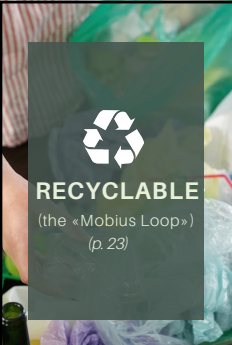
49



**COMPOSTABLE;
DEGRADABLE**
(pp. 22)

- May not be used if the product contains substances that have a negative impact on the environment or that are spread through composting.
- There must be scientific evidence that all material in the packaging or product is compostable or degradable within a similar time-frame as comparable products.
- It must be clearly stated whether specific facilities are required for composting.

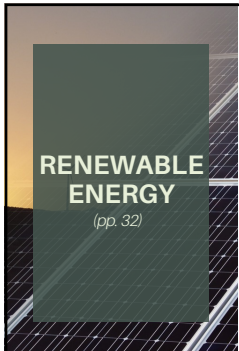
50



RECYCLABLE
(the «Mobius Loop»)
(p. 23)

- Often used as a symbol to indicate that a product is recyclable or contains recyclable material. Important to clearly show what meaning the symbol has in connection with the symbol.
- It may still be required to specify the symbol to clarify whether the product and the packaging are recyclable or only one of them.
- The symbol is useful even if the entire product is not recyclable. For example: «Contains X % recycled materials»

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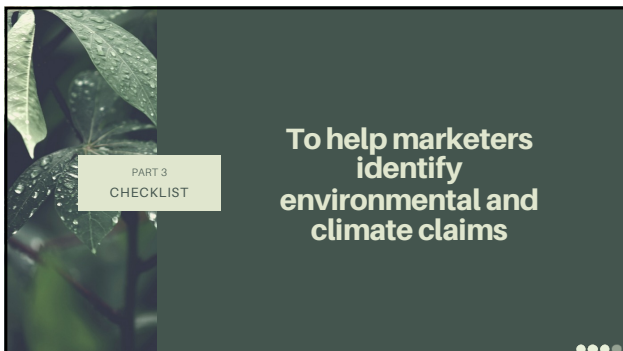
- Electricity derived from sources that are constantly replenished. Local laws may apply.
- Non-specified claims are only allowed if 100 % of the energy used is derived from renewable energy resources. In other cases, the claim should be qualified.
- Claims that renewable energy or power is used must be substantiated by an agreement with an electricity producer or distributor with an electricity certificate or other similar instrument that prevents «double-counting».

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- The fact that a product contains a legal limit of a chemical does not mean that it is free from it.
- It might be misleading to claim that a product is free from a hazardous substance if the product contains another hazardous substance.
- Should not be used for products/ categories of products where the substance has never occurred.
- The claim «microplastic-free» must for example be both specified and based on reliable scientific evidence.


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PART 3
CHECKLIST

To help marketers
identify
environmental and
climate claims

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«DO YOUR PROPOSED CLAIMS ADDRESS»


If the answer is yes to one or more of the questions, one or more environmental claims apply. It is then necessary to assess the overall impression of the marketing and ensure that it is not misleading or deceptive to the intended target group.

PURPOSE: make it easier for marketers, communication agencies, etc. to understand when making an environmental or climate claim and to provide guidance on questions that arise in practical work.

Designed as a control tool to identify a number of claims and some considerations that should be made in relation to them

Screening test with clear instructions accompanying each question

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ARE THESE BENEFITS OR EFFECTS EXPRESS OR IMPLIED?

Do you make express statements such as those above?

Do you use colours (e.g., green), pictures (e.g., trees, mountains, wildlife) or other elements to connote environmental or sustainability benefits?

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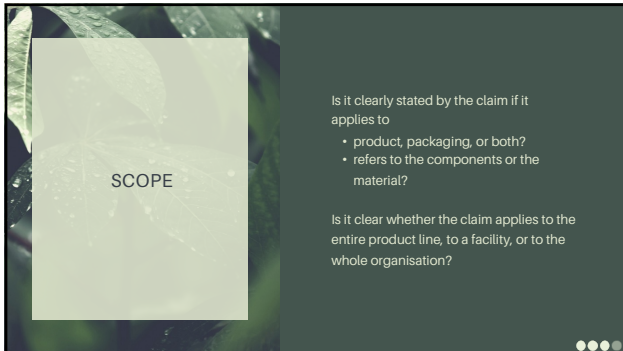
ARE YOUR PROPOSED CLAIMS SUBJECT TO ANY MANDATORY REGULATIONS OR LEGISLATION?

Special and more far-reaching disclosure obligations may apply to advertising and labelling. The claim may need to be substantiated with the application of specific standards or methods.

Is the claim specific and unambiguous?

The ability to claim that the product offers a unique environmental benefit may be limited.

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SCOPE

Is it clearly stated by the claim if it applies to

- product, packaging, or both?
- refers to the components or the material?

Is it clear whether the claim applies to the entire product line, to a facility, or to the whole organisation?

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DO YOU HAVE A REASONABLE BASIS FOR THE EXPRESS AND IMPLIED CLAIM(S) YOU ARE MAKING?

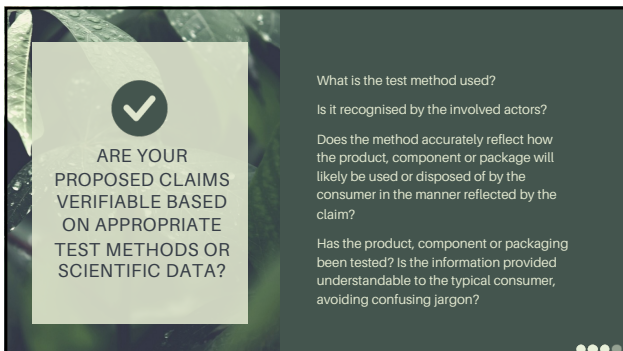
Did you have substantiating scientific data to support the claim at the time the claim was made?

Does the data reflect sound scientific principles likely to be accepted by qualified experts?

Is the data readily available in the event of a challenge or question?

Do you have procedures to retain the substantiating information for an appropriate period related to the useful life of the product?

59



ARE YOUR PROPOSED CLAIMS VERIFIABLE BASED ON APPROPRIATE TEST METHODS OR SCIENTIFIC DATA?


What is the test method used?

Is it recognised by the involved actors?

Does the method accurately reflect how the product, component or package will likely be used or disposed of by the consumer in the manner reflected by the claim?

Has the product, component or packaging been tested? Is the information provided understandable to the typical consumer, avoiding confusing jargon?

60



GENERALISATIONS

Are you making a general claim that the product, component or packaging is «good» for the environment linked to a simply expressed characteristic (e.g. «eco-safe», «earth friendly», «environmentally friendly», «sustainable», «green», «carbon neutral» or similar)?

- Probably misleading
- Transparency is required around claims about emission reductions.

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IS THE CLAIM RELEVANT TO THE INTENDED AUDIENCE?

It may be misleading or deceptive to make a claim about an environmental benefit that suggests there is a meaningful benefit when there is not.

DO YOU STATE OR IMPLY THAT THE PRODUCT, COMPONENT, OR PACKAGE HAS UNIQUE ENVIRONMENTAL BENEFITS?

Environmental benefits shared by other similar products, components or packages should not be presented in a way that suggests the benefit is unique to the marketer's product.

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ARE YOU MAKING A CLAIM BASED ON THE PRODUCT'S LIFE CYCLE?

Important to ensure that an intended analysis correctly captures the product's expected environmental effects.

DOES THE CLAIM ALSO RELATE TO HEALTH, SAFETY OR OTHER BENEFITS APART FROM ENVIRONMENTAL BENEFITS?

Direct or indirect health claims must have a reasonable basis. Therefore, claims about health and the environment may need to be substantiated separately with reliable scientific evidence.

63

DO YOU STATE OR IMPLY THAT THE PRODUCT, COMPONENT OR PACKAGING WAS MADE WITH RENEWABLE MATERIAL OR ENERGY?

An unqualified claim of renewability should not be made unless the product or packaging consists of 100% renewable content, excluding minor, incidental components.

Claims about use of renewable energy or power should be substantiated through contracts with electricity producers, renewable energy certificates, etc.

64

ARE IN-HOUSE MARKETERS AND OUTSIDE MARKETING AGENCIES TRAINED TO UNDERSTAND LEGAL REQUIREMENTS AND RECOMMENDED BEST PRACTICES?

DO INDIVIDUALS REPRESENTED AS ENVIRONMENTAL EXPERTS HAVE THE RELEVANT EDUCATION, TRAINING AND EXPERIENCE?

Training and education regarding good advertising practices is recommended for all marketing communication.

If not, are appropriate qualifiers included? Do endorsements and testimonials related to environmental claims meet applicable guidelines for endorsement? [...]

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1 BACKGROUND
ICC
EXTENDED GUIDANCE

2 RELATIONSHIP LAW-ETHICS
LEGAL STARTING POINTS
ICC CODE'S CHAPTER D

3 EXTENDED GUIDANCE
EXAMPLES OF THE USE OF SPECIFIC ENVIRONMENTAL CLAIMS
THE CHECKLIST

4 SUMMARY
ADVICE
QUESTIONS

OUTLINE


66

- The extended guidelines clarify the interpretation of environmental claims
- Mainly aimed at practitioners in marketing - with concrete positions and checklist
- Imprecise environmental claims without a qualification risk being considered misleading
- Even statements that directly or indirectly state or give the impression of a certain environmental aspect constitute an environmental claim

- High evidentiary requirements for the validity of environmental claims
- Even qualified claims about climate compensation, and that the company can prove to be factually accurate, can be judged as misleading
- Communicating climate goals can be more manageable than direct environmental claims

SUMMARY


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CONCLUSION

- Time for internal legal procedures where communication is cleared before publication
- Also applies to collaborating partners
- ICC framework, an important tool
- This particularly applies to environmental claims, but of course also in general
- Business and image risks
- Education and awareness

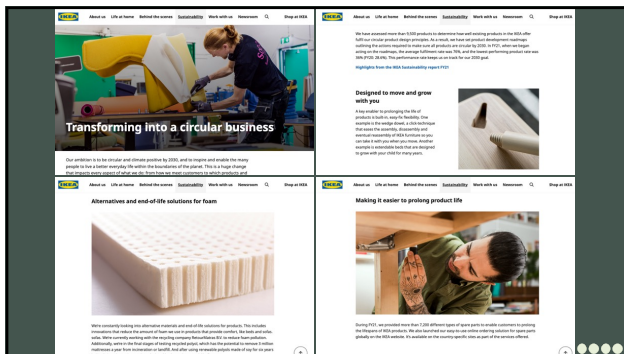
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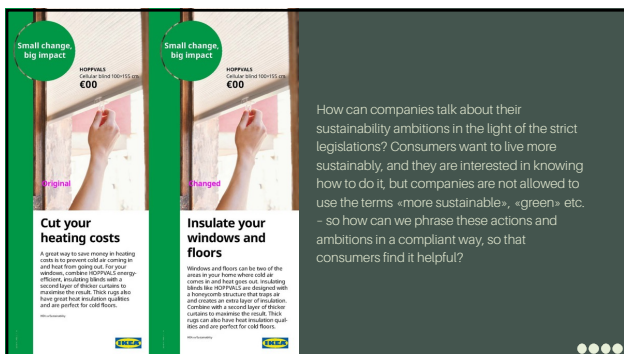
QUESTIONS

- When we make a sustainability-related claim or ambition, how accessible for the consumer does the proof to substantiate this claim need to be/where does it need to appear?

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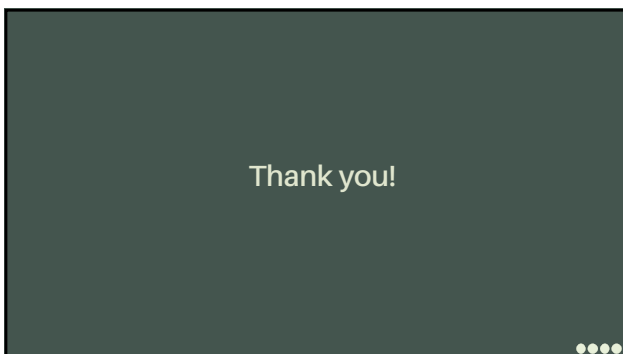
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