



ICC FRAMEWORK FOR **RESPONSIBLE ENVIRONMENTAL MARKETING COMMUNICATIONS**

November 2021

INTRODUCTION AND BACKGROUND

As the world's largest business organization, the International Chamber of Commerce (ICC) promotes high standards of business ethics through the development and dissemination of codes and guidance on responsible marketing and advertising communications. One of ICC's landmark achievements is the ICC Advertising and Marketing Communications Code (Code). First adopted in 1937 and updated many times since then (most recently in 2018), the Code provides practical guidance to advertising industry stakeholders, including advertisers and advertising agencies, as well as to self-regulatory advertising organisations and national governments. By promoting self-regulation in the business sector in accordance with globally recognised high ethical and legal standards, consumers can be confident that businesses abiding by the Code and related ICC Guidance can be relied upon to provide truthful advertising, thus fostering a robust marketplace that both enhances creativity and preserves consumer trust.

The ICC Code sets forth general principles governing marketing communications of all types and in all media. It includes a separate section, Chapter D, on environmental marketing communications. For many years, the General Code and Chapter D have been augmented by the ICC Framework for Responsible Environmental Marketing Communications (Environmental Framework), which serves as a practical guide to advertisers, self-regulatory organisations and the broader advertising ecosystem, in addressing environmental claims to assure that claims are truthful and not misleading and are appropriately substantiated. The updated Framework continues to reflect the longstanding principle that all claims, including environmental claims, are evaluated in the context in which they appear and that marketers should consider the net impression of the claim as a whole. The ICC Code and this Framework thus provide a roadmap for global marketers in developing environmental claims and campaigns.

There is renewed interest in environmental marketing, particularly in the context of growing momentum on climate action globally, including collective efforts by governments and businesses to mitigate the threats of climate change. The current revision of the Environmental Framework addresses a number of new emerging claims in the marketplace.

SIGNIFICANT CHANGES

The updated 2021 Environmental Framework provides added guidance on some established environmental claims and additional guidance on some emerging claims:

- > Climate-related claims: including carbon footprint, carbon offset, carbon neutral, carbon negative, net zero, and climate positive. These may be aspirational claims related to goals of reducing, neutralising or compensating a company's climate impact of producing a product, component, package, service or a company's business operations over time.
- > Circularity claims: including circular, circularity, and circular economy
- > Additional "free-of" claims: including "micro-plastics free" and "not made with fossil fuels"
- > Recyclability claims and the use of material identification codes
- > Recycled content claims
- > Degradable claims: including biodegradable, marine degradable, oxo-biodegradable, and photodegradable

As not all terms are subject to globally agreed definitions or criteria, the Framework does not attempt to offer specific definitions in all instances. Rather, the Framework reminds marketers to take steps to assure that all environmental claims are clear and appropriately substantiated by sound scientific evidence. As with all guidance issued by the ICC Marketing and Advertising Commission, the Environmental Framework is grounded in the principle that freedom of

commercial speech in the sale of all legal products and services is a fundamental tenet of free markets. Free markets promote innovation, economic development and competition as companies compete to provide consumers with products and services that reflect their interests and concerns and offer them a range of choices. The global business community is keenly aware that the proper functioning of a free-market economy depends on consumers receiving accurate and truthful information about products, services or operations.

It is a fundamental requirement of the ICC Code that claims should be truthful, non-misleading, clear, and substantiated. ICC therefore denounces the use of exaggerated, unsubstantiated claims that (may) deceive consumers into falsely believing the marketer's products, services or operations are environmentally sound. This practice, sometimes characterised as “greenwashing”, has the potential to both undermine consumer confidence and penalise marketers who adhere to appropriate regulations and guidelines.

PURPOSE AND APPLICATION

The Environmental Framework provides a summary of the principles of the ICC Code including those outlined in Chapter D on environmental claims and supplements them with additional commentary and guidance to aid practitioners in applying the principles to environmental advertising. Chapter D of the Code was initially drafted after a broad review of relevant global guidance on environmental marketing around the world¹. Recognising that there are many other sources of guidance on environmental claims, as well as hundreds of test methods and standards that may be considered, ICC does not endorse or require adoption of any specific national or international standard or method. Instead, the Framework, like the ICC Code itself, requires that claims must be consistent with applicable law in the relevant region, and supported by appropriate substantiating data. For environmental claims, the ICC Code requires reliable scientific evidence.

Environmental claims refer to any statements, symbols, images or graphics that convey an environmental aspect of a product, component, package, service or company's business operations. Truthful and accurate environmental claims, qualified as needed, convey relevant information to consumers and the market. However, marketing communications should not contain any statement or visual treatment (including colour, signs, symbols, images, logos, etc.) likely to mislead consumers in any way about environmental aspects or advantages of the advertised product, component, package or service, or about actions being taken by the marketer in favour of the environment or the climate. The ICC Code's requirement that “Marketing communications should be truthful and not misleading” does not imply that all marketing communications that include claims about the environment must address every conceivable impact on the environment or require conducting a full life cycle analysis (LCA) as an essential prerequisite. An LCA is appropriate where an unqualified general environmental claim is made, which typically suggests that the claim relates to the entire life cycle of a product, component, or package.

The Environmental Framework provides added guidance and commentary to help marketers understand how to apply principles of substantiation and qualification to a number of specific environmental terms used in advertising. However, the general principles of ethical advertising apply regardless of whether a specific term is referenced in the Code (including Chapter D) or this Framework.

¹ Sources reviewed include the International Standards Organization (ISO) 14021 standard, the U.S. Federal Trade Commission (FTC) Guides for the Use of Environmental Marketing Claims, the EU guideline for the Unfair Commercial Practices Directive, the Canadian Competition Bureau's Environmental Claims: A Guide for Industry and Advertisers, and other guidelines and standards on environmental claims.

Digital scope and application

The Framework, like the ICC Code itself, covers all forms of advertising and marketing communications claims, including digital advertising and social media. It is technology and media neutral. It applies to the entire marketing eco-system, guiding communications practitioners, advertising agencies, publishers, media owners, contractors and other participants including market influencers, bloggers, vloggers, affiliate networks, data analytics, ad tech companies, and those responsible for preparing algorithms and artificial intelligence technologies for marketing communications purposes.

References to products include digital ones.

CONCLUSION

As a leader in responsible marketing worldwide, the ICC intends that the ICC Code and the Environmental Framework serve as a practical and useful resource to practitioners.

Users should remember that environmental claims—whether or not specifically discussed in the Code or this Environmental Framework—should meet the letter and spirit of the principles of the Code, as well as applicable local legal and regulatory requirements. The intent in providing this 2021 updated Environmental Framework is to provide a resource for advertising industry stakeholders in meeting their responsibilities to provide truthful and appropriately supported environmental claims.

How to use this guidance

Part 1 of this Environmental Framework provides a comparative chart identifying relevant general provisions from the ICC Code in column 1, relevant provisions from Chapter D of the Code in column 2, and added commentary, observations and suggestions in column 3.

Part 2 of this Environmental Framework describes a number of specific environmental claims or terms in column 1, and application of ICC principles and other considerations when such terms are used in marketing communications in column 2.

Annex 1 is a checklist that marketers may find useful in evaluating their environmental claims. While this Framework provides guidance on a number of popular terms in environmental advertising, the terms covered are not intended to be an exclusive or exhaustive list of possible environmental claims. Regardless of whether or not a specific claim is defined in this Framework, good advertising principles set forth in the ICC Code should be followed and should reflect the core principle of the ICC Code: all claims must be legal, decent, honest and truthful.



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Part 1 of this Environmental Framework provides a comparative chart identifying relevant general provisions from the ICC Code in column 1, relevant provisions from Chapter D of the Code in column 2, and added commentary, observations and suggestions in column 3. **Part 2** of this Environmental Framework describes a number of specific environmental claims or terms in column 1, and application of ICC principles and other considerations when such terms are used in marketing communications in column 2. **Annex 1** is a checklist that marketers may find useful in evaluating their environmental claims. While this Framework provides guidance on a number of popular terms in environmental advertising, the terms covered are not intended to be an exclusive or exhaustive list of possible environmental claims. Regardless of whether or not a specific claim is defined in this Framework, good advertising principles set forth in the ICC Code should be followed and should reflect the core principle of the ICC Code: all claims must be legal, decent, honest and truthful.

PART 1 EXISTING ICC CODE PROVISIONS ON ENVIRONMENTAL MARKETING AND SUGGESTED CONSIDERATIONS FOR PRACTITIONERS

Part 1 of the Environmental Framework draws directly from existing provisions in the ICC Code and Chapter D, respectively. The guidance in column three reflects recommendations of the ICC Commission on Marketing and Advertising on some practical ways to implement the provisions of the Code and Chapter D for the specific environmental claim identified.

ICC PRINCIPLES General Provisions on Advertising and Marketing Communication Practice	ICC PRINCIPLES Chapter D—Environmental Claims in Marketing Communications	OTHER CONSIDERATIONS in Environmental Marketing Communications
<p>Article 1: Basic Principles</p> <p>All marketing communications should be legal, decent, honest, and truthful.</p>	<p>Article D1: Honest and truthful presentation</p> <p>Marketing communications should not contain any statement or visual treatment likely to mislead consumers about the environmental aspects or advantages of a product, component, package or service, or about actions being taken by the marketer in favour of the environment.</p>	<p>The starting point for the evaluation of any environmental claim in a marketing communication is the applicable legal framework in which the claim will be made. Marketers should comply with applicable environmental requirements, including advertising or labelling requirements mandated by law, such as energy testing and labelling requirements for, e.g., appliances, insulation, light bulbs, or car mileage. Specific environmental claims may also be regulated at the local level, and such claims may have to be supported by specific tests or versions of tests.</p> <p>Environmental claims must have a sound scientific basis; the level of substantiation generally required for environmental claims is reliable scientific evidence, which may include, in appropriate circumstances, internal or third-party test data, data drawn from peer-reviewed or other scientific studies, or other reliable sources that would be considered by experts in the field as relevant and probative. Substantiating data must reflect the environmental condition(s) or impact(s) being assessed in a realistic manner.</p> <p>Both the express and implied messages that the typical consumer (sometimes referred to as “reasonable consumer”) or other intended audience takes away from the marketing communication must be supported.</p>

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<p>All marketing communications should be prepared with a due sense of social and professional responsibility and should conform to the principles of fair competition, as generally accepted in business.</p> <p>No communication should be made that impairs public confidence in marketing.</p>	<p>Corporate communications may refer to specific products or activities but should not imply without justification that they extend to the whole performance of a company, group or industry.</p>	<p>Qualifiers or disclaimers should be provided as necessary to avoid misleading consumers. Where qualifiers or disclaimers are needed, they should be clear, prominent and in close proximity to the claim so qualified. This Framework is not intended to limit or restrict marketers from offering additional useful information through website links, QR codes and other available means.</p> <p>Overstating the environmental, social or economic benefits of a product, service or activity, or failing to provide adequate substantiation for such claims, poses great potential harm to the marketplace as a whole. Marketers should avoid claims that an environmental attribute is unique to a product, component, package, service, or marketer’s business operations when it is in fact a legal requirement.</p> <p>False, deceptive or misleading environmental claims (sometimes referred to as “greenwashing”) are no different from any other type of deceptive or misleading claim in marketing communications. To maintain confidence both in marketing communications and in the self-regulation system, marketing communications should respect the letter as well as the spirit of the ICC Code, this Framework, applicable legal requirements, and local and sectoral self-regulatory codes.</p>
<p>Article 4: Honesty</p> <p>Marketing communications should be so framed as not to abuse the trust of consumers or exploit their lack of experience or knowledge.</p>	<p>Article D1: Honest and truthful presentation</p> <p>Marketing communications should be framed so as not to abuse consumers’ concern for the environment or exploit their possible lack of environmental knowledge.</p>	<p>Where claims or terminology used in marketing communication might reasonably be interpreted by a consumer as environmental claims, they should be supported by reliable scientific evidence (cf. Article 6: Substantiation) and be consistent with definitions and concepts that would be accepted as reliable by experts in the field.</p>

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<p>Article 5: Truthfulness</p> <p>Marketing communications should not contain any statement, or audio or visual treatment which, directly or by implication, omission, ambiguity or exaggeration, is likely to mislead the consumer, in particular, but not exclusively, with regard to:</p> <ul style="list-style-type: none"> > Compliance with standards. > Official recognition or approval. > Characteristics of the product which are material, i.e., likely to influence the consumer's choice, such as: <ul style="list-style-type: none"> ○ Nature, composition, method of manufacture. ○ Efficiency and performance. ○ Geographical origin. ○ Environmental impact. ○ Safety. 	<p>Article D1: Honest and truthful presentation</p> <p>Vague or non-specific claims of environmental benefit, which may convey a range of meanings to consumers, should be made only if they are valid, without qualification, in all reasonably foreseeable circumstances. If that is not the case, general environmental claims should either be qualified or avoided.</p> <p>Article D4: Product life cycle, components and elements</p> <p>Environmental claims should not be presented in such a way as to imply that they relate to more stages of a product's life cycle, or to more of its properties, than is justified by the evidence; it should always be clear to which stage or which property a claim refers. A life-cycle benefits claim should be substantiated by a life cycle analysis (LCA).</p> <p>When a claim refers to the reduction of components or elements having an environmental impact, it should be clear what has been reduced.</p>	<p>Information and claims about a product's environmental attributes should be judged by the likely perception of the typical consumer. Scientific terminology or references are acceptable provided they are relevant and used in a way that can be readily understood by the typical consumer to whom the message is directed. It should also be clear if the environmental claim refers to an entire or part of a product, component, package, service or company's business operations.</p> <p>Claims should not state or imply that an improvement in performance is more significant than it is. For example, a claim that a component was produced with "30% lower carbon emissions" when the carbon emissions of the component are a small fraction of the emissions of the product as a whole would be misleading without qualification to contextualise the relatively low impact of the reduction in that specific component.</p> <p>Vague or non-specific claims (sometimes called "general" claims) include claims such as "environmentally friendly," "good for the environment," "ecologically safe," "green," "sustainable," "carbon friendly," "climate smart" or any other claims implying that a product or an activity has no impact—or only a positive impact—on the environment. The list provided is not exhaustive or exclusive; there are many other terms that may be deemed a general claim. General environmental claims should not be used without qualification unless a very high standard of proof is available, or the claim is linked to a specific properly substantiated environmental attribute that clearly limits the scope of the claim to such attribute.</p>

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	<p>Article D5: Signs and symbols</p> <p>Environmental signs or symbols should be used in marketing communication only when the source of those signs or symbols is clearly indicated and there is no likelihood of confusion over their meaning. Such signs and symbols should not be used in such a way as to falsely suggest official approval or third-party certification.</p>	<p>An unqualified “sustainability” claim may be understood to involve company actions beyond efforts to reduce environmental impacts. Claims may state or imply that the claim involves social and economic impacts, such as support for fair working conditions, diversity and inclusion, communities or charities, or the like, as well. Marketers making general sustainability claims in advertising should be mindful that consumers may take away a broader corporate social responsibility message and must substantiate all express and implied messages and qualify claims accordingly.</p> <p>Copy, sound and visual presentations in marketing communication for products should accurately represent the material and related environmental characteristics of the product featured in the communication, such as:</p> <ul style="list-style-type: none"> > The nature and source of raw materials used to make the product. > The processing methods applied to the raw materials. > The product’s use of energy, or energy efficiency. > The contents and emissions of the finished product. > End of life disposal capabilities, such as recyclability or degradability. > Any other relevant and meaningful environmental aspects. <p>Marketing communications should be truthful in regard to standards that a product meets, or certification(s) that a product receives. The standards or tests should assess conditions of actual use or disposal of the product or package.</p>

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		<p>Marketers should not use the names or logos of a government agency or third-party organisation in a manner that indicates or implies the marketers' products or services, meet standards set by such agency or organisation if they do not. This is particularly important in jurisdictions that require the use of signs and symbols to communicate environmental attributes. Marketers are free to develop and apply their own standards and use a company-developed logo to convey that it meets the company's standard provided they clearly convey that the environmental attributes of the product or service meet the company's standards and not those of a government agency or third-party organisation.</p> <p>Furthermore, company-developed logos should not resemble government agency or official third-party certification logos in a manner which could convey that government agencies or official third-party organisations certify the product or service. Qualifiers should be included as needed.</p> <p>Marketers should not expressly or impliedly claim that the environmental attributes of the company, its processes, products or services have been verified by an independent third party if they have not. For example, marketing communication should not claim that a product has been certified as "organic" if the product has not received such certification, consistent with applicable legal standards, regulations and restrictions.</p>

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	<p>Article D4: Superiority and comparative claims</p> <p>Environmental claims for products should not be based on the absence of a component, ingredient, feature or impact that has never been associated with the product category concerned. Conversely, generic features or ingredients, which are common to all or most products in the category concerned, should not be presented as if they were a unique or remarkable characteristic of the product being promoted.</p>	<p>Some claims that are literally true may be misleading because they exaggerate the benefits of the product. For example, a claim that a product contains “twice as much recycled content as before” when the amount was very low to begin with could be misleading. Claims conveyed through statements that a product “does not contain” a chemical or is “free of” that chemical may also fall in this category. These claims may be misleading if the substance, such as a chlorofluorocarbon (CFC) or hydrochlorofluorocarbon (HCFC), was never associated with the particular product. For example, dishwashing liquid might be advertised as containing “no CFCs” or being “CFC-free.” However, if dishwashing liquid products never contained CFCs, the implication that the product has been improved through removal of CFCs may be deceptive. At the same time, there may be circumstances where such a claim would be helpful to consumers, for example, if consumers might believe CFCs were an ingredient because it is common in the product category, or the marketer is responding to misperceptions in the marketplace about the ingredients. The issue of “relevance” must be considered in the context of the totality of the claim and developments in the marketplace, and the net impression from the totality of the claims by the marketer.</p> <p>The fact that a product or service is exclusively available online does not automatically mean that it is better for the environment; any such claim must be supported by reliable scientific evidence.</p>

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<p>Article 9: Use of technical/scientific data and terminology</p> <p>Marketing communications should not:</p> <ul style="list-style-type: none"> > misuse technical data, e.g., research results or quotations from technical and scientific publications; > present statistics in such a way as to exaggerate the validity of a product claim; or > use scientific terminology or vocabulary in such a way as to falsely suggest that a product claim has scientific validity. 	<p>Article D1: Honest and truthful presentation</p> <p>In particular, claims such as “environmentally friendly” or “ecologically safe”, implying that a product or an activity has no impact—or only a positive impact—on the environment, should not be used unless a very high standard of proof is available. As long as there are no definitive, generally accepted methods for measuring sustainability or confirming its accomplishments, no claim to have achieved it should be made.</p> <p>Qualifications should be clear, prominent and readily understandable to a typical consumer; the qualification should appear in close proximity to the claim being qualified, to ensure they are read together.</p> <p>Article D2: Scientific research</p> <p>An environmental claim relating to health, safety or any other benefit should be made only where it is supported by reliable scientific evidence.</p>	<p>All environmental benefit information and claims should be supported by reliable scientific evidence.</p> <p>Many tests exist to evaluate specific aspects of a product’s impact on the environment, such as its ability to degrade or be composted under specific conditions. Local laws and regulations may require use of specific test methods.</p> <p>A specific claim about individual environmental attributes supported by reliable evidence could be linked to a claim of “sustainability” (for example, “our products are sustainable because they are made of 100% post-consumer recycled content and are recyclable”); however, marketers should avoid stating or implying that a product is “sustainable” without qualification simply because it has some positive environmental benefits.</p> <p>If a marketer states or implies that a product has minimal negative environmental impact throughout its life cycle (for example, “from cradle to grave, the most eco-friendly product on the market”), the claim implies that it is supported by an LCA, and the marketer should disclose the standard that was relied on to make the claim. If a marketer makes a sustainability claim based on a single attribute, an LCA is not required, but the marketer must link the general claim, such as “sustainably produced,” to the relevant, appropriately substantiated claim about that single attribute. The marketer must bear in mind that by also making a general claim, it should not overstate the environmental benefits of a product in a misleading way.</p>

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		<p>Tests and statistics used to support environmental claims should relate to conditions likely to be experienced by the consumer to assure the test results provide a reliable scientific basis to substantiate the specific advertising claim. Further, tests should be conducted on the actual product (or one that is substantially identical) to assure the results are applicable to the product for which the claim is made. For example, tests on raw materials (e.g., compostability of a plastic resin) may not be fully representative of the performance of finished products (e.g., compostability of a plastic container made of that resin); if they are not, the tests may not provide adequate substantiation for the claim.</p> <p>Marketers should specify whether an environmental claim applies to a product, to part of the product or to its packaging if the context is not otherwise clear. In some cases, whether the claim applies to a product, or its packaging will be apparent. For example, a claim that a milk carton is “recyclable” self-evidently applies to the carton and not the milk as no typical consumer would think that the claim applies to the milk. In contrast, a “recyclable” claim for a paperboard cereal carton with a wax paper inner liner should clarify if the claim applies to the paperboard carton, the inner liner, or both.</p> <p>Even apparently simple environmental claims may require qualification or explanation. For example, when a product is labelled as “recyclable,” or the common symbol, the Mobius loop, appears on the product or package, a consumer may not understand whether the package, the product itself, or both are recyclable. Also, the consumer may not understand whether the product or package is merely capable of being recycled or can actually be recycled in the local community.</p>

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		<p>Since the Mobius loop may also indicate recycled content, further disclosures are needed if the product or package is recyclable but does not contain recycled content. Adding an appropriate qualifier (such as adding “85% recycled content” in close proximity to the Mobius loop) should appropriately convey that the claim involves recycled content rather than recyclability. Marketers should consider whether qualifiers should be integrated into the advertisement to ensure that the claim is clear to the consumer.</p> <p>Consumers are now familiar with using the Internet to locate information and have widespread access to online resources. There may be circumstances where it is appropriate to use a qualifier that refers a consumer to a website where accurate additional information may be obtained. An example might be: “Recyclable in some communities. Visit [insert URL] for information on available facilities.” In this case, the actual qualifier (recyclable in some communities) conveying the rather limited nature of recycling should be placed in close proximity to the claim, but a link to where consumers can find additional information is not part of the needed qualifier. Instead, it provides a way for consumers to obtain additional useful information. Particularly where the claim relates to end of life disposal, the consumer will often have the ability to take appropriate action by checking online when the product is ready to be discarded and providing such information could encourage consumers to actually check on recycling options in local areas.</p> <p>Claims that a product, package or component is “free” of a chemical or substance often are intended as an express or implied health or safety claim, for example.</p>

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		<p>Such claims occur even where there is a debate in the scientific literature, and conclusive information about safety is not available. Such claims may legitimately respond to consumer concerns about the chemical. The substantiation necessary to support an express or implied health or safety claim about the absence of a chemical or other substance may be different from the substantiation required to support the environmental benefit claim. The marketer must be sure to have reliable scientific evidence to support an express or implied health and safety claim.</p> <p>For example, a claim that a product is “free of phthalates” is supported by evidence that the product contains no intentionally added phthalates and that levels present are no more than a trace or background level. Likewise, marketers should use care if an alternative substance with potential safety or health effects has been substituted. However, if the claim includes an express safety claim, such as “Safe!” or “Safe, Phthalate-free,” or conveys a broader implied claim by associating the “free of” claim with a health benefit or safety claim, additional evidence may be needed to support any express or implied claim about safety. Such claims could be implied comparative claims that products containing phthalates are “unsafe” or that the phthalate-free product is safe despite possible risks of substitute substances. The elimination of a specific substance does not automatically substantiate a claim that it is “safer” than a product that includes the referenced substance.</p>

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<p>Article 6: Substantiation</p> <p>Descriptions, claims, or illustrations relating to verifiable facts in a marketing communication should be capable of substantiation. Such substantiation should be available so that evidence can be produced without delay and upon request to the self-regulatory organisations responsible for the implementation of the Code.</p>	<p>Article D2: Scientific research</p> <p>Marketing communications should use technical demonstrations or scientific findings about environmental impact only when they are backed by reliable scientific evidence.</p>	<p>Scientific terminology should be used in a way that can be readily understood by those to whom the message is directed. Technical demonstrations and visuals (including dramatizations) must be based on relevant scientific data, common use patterns, and should be qualified as needed to avoid any misleading implication.</p> <p>Marketers must be able to support claims at the time the claim is made but are not required to include supporting information in marketing communications. However, if they do, the additional information provided must be truthful and not misleading. Test methods and statistical models may be appropriate; however, they must be relevant to the particular attribute and product conditions of use, and to the particular environmental impact that the marketer is measuring.</p>
<p>Article 7: Identification and transparency</p> <p>Marketing communications should be clearly distinguishable as such, whatever their form and whatever the medium used. The true commercial purpose of marketing communications should be transparent and not misrepresent their true commercial purpose.</p>	<p>Article D1: Honest and truthful presentation</p> <p>Corporate communications may refer to specific products or activities but should not imply without justification that they extend to the whole performance of a company, group or industry.</p>	<p>Corporate communications intended to convey broad organisational goals or aspirations about the environment or sustainability initiatives, like a sustainability report, may not constitute advertising. Reports on environmental actions may be required under applicable laws, for example. To the extent any such report, whether required or voluntarily provided, is deemed to constitute advertising, it can often be structured to properly contextualise statements that are viewed as advertising claims. Marketing communications that reflect specific environmental commitments, even if aspirational and likely not to be met until many years in the future, such as net zero, carbon negative, climate positive claims and the like, require that the company is able to demonstrate that it has a reasonable basis to believe it has the capacity and methodological approach to achieve such a commitment in the specified timeframe.</p>

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<p>Article 11: Comparisons</p> <p>Marketing communication containing comparisons should be so designed that the comparison is not likely to mislead and should comply with the principles of fair competition. Points of comparison should be based on facts which can be substantiated and should not be unfairly selected.</p>	<p>Article D3: Superiority and comparative claims</p> <p>Any comparative claims should be specific and the basis for comparison should be clear. Environmental superiority over competitors should be claimed only when a significant advantage can be demonstrated. Products being compared should meet the same needs and be intended for the same purpose.</p> <p>Comparative claims for products, whether the comparison is with the marketer's own previous process or product or with those of a competitor, should be worded in such a way as to make it clear whether the advantage being claimed is absolute or relative. Improvements related to a product and its packaging should be presented separately, and should not be combined, in keeping with the principle that claims should be specific and clearly relate to the product, an ingredient of the product, or the packaging or ingredient of the packaging.</p> <p>Article D4: Product life cycle, components and elements</p> <p>Environmental claims should not be presented in such a way as to imply that they relate to more stages of a product's life cycle, or to more of its properties, than is justified by the evidence; it should always be clear to which stage or which property a claim refers. A life-cycle benefits claim should be substantiated by an LCA.</p>	<p>Claims that a product "does not contain" a chemical or is "free" of that chemical are often used to establish a comparison between different versions of the same product, or to establish a comparison with a competitor's products. Such claims can be misleading if in fact the product does contain the chemical or, even if it does not, contains a similar chemical with a similar impact, or an alternative with another significant environmental impact. If there is a direct comparative claim, the claim should make clear whether the comparison is to a competitor's product or to another version of the same product. Likewise, it should make clear whether obtaining the benefit requires specific action by the consumer.</p> <p>Nothing in the ICC Code or this Framework is intended to suggest that a full LCA is required to support all environmental claims. Many marketers properly focus on a single element of a product's life cycle deemed to have the most significant environmental impact. For example, for appliances, energy and/or water consumption during use typically represents the most significant environmental burden. The relevant aspect of the product's life cycle to be considered will depend on the claim. The reliable scientific evidence required to support</p>

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	<p>When a claim refers to the reduction of components or elements having an environmental impact, it should be clear what has been reduced. Such claims are justified only if they relate to alternative processes, components or elements which result in a significant environmental improvement, taking all relevant aspects of the product's life cycle into account.</p> <p>Claims that a product does not contain a particular ingredient or component, e.g., that the product is "X-free", should be used only when the level of the specified substance does not exceed that of an acknowledged trace contaminant or background level.</p>	<p>a single attribute claim should relate to the environmental impact of the claimed attribute in the relevant portion of the life cycle. If, however, the marketer states or implies that the claimed attribute results in a broader environmental benefit, additional evidence, such as an LCA, may be required. When using an LCA, companies should not make claims that may be misleading from a life cycle perspective.</p> <p>A CFC-free claim may be misleading if it implies that the product has no impact on stratospheric ozone, or no impact (or only a positive impact) on air quality. A "free of" claim may also be misleading if it implies to the typical consumer that the compared product is unsafe, toxic or harmful when it is not. For example, advertising a product as superior to a competitor's product because it is "CFC-free" may be misleading if the product or class of products had never contained CFCs or contains other chemicals that may also have an impact on depletion of stratospheric ozone.</p> <p>Some regulators have indicated that trace or background levels of a substance may be present in products advertised as "free of" that substance given chemical measurement challenges. Determining what level is "trace" or "background" in particular circumstances may be difficult; reference to levels regulated by environmental or health and safety laws, laboratory methods and detection limits, or other standards, may be appropriate. In some regions, the concept is expressed as "de minimis" rather than trace or background, reflecting a level not likely to involve environmental or other potential harmful exposure. If the substance is not added intentionally during manufacturing of the product to which the claim attaches, and manufacturing operations limit the</p>

ICC PRINCIPLES General Provisions on Advertising and Marketing Communication Practice	ICC PRINCIPLES Chapter D—Environmental Claims in Marketing Communications	OTHER CONSIDERATIONS in Environmental Marketing Communications
	<p>Article D6: Waste handling</p> <p>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. If not, the extent of availability should be accurately described.</p>	<p>potential for cross-contamination, a claim such as “no intentionally added xx” may be appropriate. However, if achieving the claimed reduction results in an increase in other harmful materials, the claim may be misleading.</p> <p>Marketers should disclose limitations on availability of recommended waste disposal options, such as recycling or composting. Where the claimed disposal method is subject to significant limitations, then qualifiers identifying those limits may need to be more robust. Marketers may advise consumers to check for local codes or guidance on the required level of availability, as it may be different in different jurisdictions, but such a statement does not necessarily substitute for an appropriate qualifier that “available recycling/composting facilities are limited.”</p>

PART 2 SELECTED ENVIRONMENTAL CLAIMS

Part 2 of the Environmental Framework addresses a selection of specific environmental claims that have entered the marketplace, not all of which are specifically covered in the ICC Code. Suggested definitions are set forth in column 1, and application of ICC Principles and other considerations offering added guidance are set forth in column 2.

Chapter D for many years included detailed guidance on use of some common environmental claims. Specific claims discussed in Chapter D have always been illustrative, not exhaustive, but the Framework provides additional guidance on terms covered in Chapter D, and from time to time addresses new or additional claims. Principles provided in the Code and in Chapter D should be considered and applied as to all environmental claims, whether or not such claim is specifically addressed in the Code or this Framework. The purpose of the Code and this 2021 Framework Guidance is to offer guidance on how to assure that environmental claims are truthful and not misleading. It is not the purpose of the ICC Code to seek to establish or advance environmental policy.

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 (CFCs, HCFCs; hydrofluorocarbons (HFCs), perfluorocarbons (PFCs); sulphur hexafluoride (SF₆) and halons)) are widely recognised 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>

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

Claims related to carbon emissions, carbon neutral claims, as well as carbon negative, net zero, and climate positive, may be aspirational claims related to goals of reducing or neutralising climate impact of producing a product, service or a company's business operations over time. Claims may reflect steps taken or to be taken through emissions reduction or compensation measures (carbon offsets).

Carbon offsets generally relate to reductions from other actions designed to capture carbon, like tree planting, methane capture and other actions, which may often take place outside the actual operations of the business or the location of operation. "Offsets" or credits may be purchased in the marketplace and traded to individuals or businesses in an effort to reduce the "carbon footprint." Because climate change is a global phenomenon, any legitimate and appropriately supported action to reduce carbon contributions is an appropriate subject of a properly qualified advertising claim.

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

Aspirational claims/commitments

Communications that reflect specific environmental commitments or expressions of climate (or sustainability) goals that are aspirational in nature and not likely to be met until many years in the future, (e.g., net zero, carbon negative, climate positive, etc), require that the company is able to demonstrate, in concrete terms, that it has a reasonable capacity and methodological approach to meet such a commitment, including the permanence of carbon removals. Information about when advertised carbon-related benefits are likely to be realised may be important to consumers. Consequently, information on when the carbon reductions or offsets are likely to occur should be disclosed.

As with all claims, the marketer should have reliable scientific evidence to support any carbon-related claim, recognising that the science continues to evolve. Qualifiers should be included if offsets will occur in the future. Claims should be based on reliable scientific evidence of a sort likely to be accepted by experts qualified by education, training and experience in the field.

Applicable local laws

Some jurisdictions may restrict carbon offset or related carbon or climate benefit claims associated with activities that must be taken by the marketer under applicable law. As outlined in the ICC Code, marketers should make sure their marketing communications activities observe applicable laws and regulations in the market in which the claim is directed and should avoid any claims, whether involving climate actions or other attributes, suggesting that its products or actions are unique when the actions or attributes are otherwise required by law.

Carbon or climate claims

Carbon neutral claims are understood to mean that the net carbon footprint is zero, but in many cases, zero carbon contributions, neutral carbon, carbon negative or climate positive benefits can still only be achieved using offsets, removals or credits. The science of calculating carbon or overall climate impacts associated with emissions of all GHGs continues to evolve.

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

Circular; Circularity; Circular Economy

The concept of “circularity” or a “circular economy” is based on reducing waste through actions such as sharing, leasing, reuse, repair, refurbishment and recycling to improve management of resources, reduce waste, and reduce climate impacts. Definitions of the concept of the circular economy continue to evolve.

Consequently, the ICC Code recommends that marketers making carbon or climate claims, including advertising commitments that they expect to achieve or will be realised in the future, should be clear and include qualifiers as needed regarding the method, basis and time frame relied upon for such commitments to be realised. Claims should use the same time scales for emissions, emissions reductions, and offsets.

Additional qualifiers may be needed to achieve the required level of transparency and clarity of the claim required by the Code and to avoid consumer misperception that a product, component, package, service or company’s business operation poses no adverse impact on the environment or is based on a full LCA of all GHG emissions if that is not the case. Steps taken through emissions reduction or compensation measures should be clearly distinguished. Marketers should rely on generally accepted definitions of these concepts, where available, and include qualifiers to clarify the meaning to consumers. Marketers should use care in adopting climate-related terms such as carbon neutral, climate neutral and net zero, as each may be defined somewhat differently and/or require different substantiating data.

A variety of non-governmental and governmental organisations are evaluating definitions of circularity and what steps are necessary to achieve it. At present there is no global agreement on standards to apply in connection with claims that products or processes are “circular”. Any claims of circularity should be based on an appropriate assessment and marketers should make clear what is meant by the claim and disclose the basis for the claim.

Compostable

Characteristic of a product or packaging that allow it to break down into or otherwise become part of usable compost in an appropriate composting facility or device.

Marketers should have reliable evidence that all the materials in the product or package will break down into or otherwise become part of usable compost (e.g., humus, mulch or other soil-conditioning material) in an appropriate composting facility or device. If this will occur only in facilities other than home composting facilities, this fact should be clearly disclosed, along with limitations on the availability of such facilities. Consideration should be given to the timeframe in which materials are expected to compost. Products or packaging advertised as compostable should turn into usable compost in

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

Degradable (including Biodegradable, Marine Degradable, Oxo-biodegradable, Photodegradable, etc.)

A characteristic of a product or packaging that, in specific conditions, allows it to break down into elements known to nature within a given time. The claim should not be made for a product or packaging, or any component, which releases substances in concentrations harmful to the environment. Specific claims about degradability, such as “biodegradable”, “marine degradable”, “oxobiodegradable” and “photodegradable”, are all degradability claims.

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

a timeframe consistent with other materials composted under the same conditions. This claim should not be made if the compost, composting system or environment is negatively affected to an appreciable extent by the materials in the product or package. Similar to guidance on “free of” claims, marketers should confirm that as the product or package breaks down, it does not release substances that negatively affect the ability to form usable compost. Reference to the specific test method used is not required but may be useful. Jurisdiction-specific test methods or standards may be required to evaluate compostability.

A general degradability claim should not be made unless the marketer has reliable evidence that the product or packaging will degrade in all potential disposal environments.

Products or packaging may be shown to degrade only in a specific environment (e.g., soil, marine, or certain landfill environments). Qualifiers should describe the specific environment in which degradation occurs. Products or packaging may go through different phases in the degradation process as they break down, but to support any type of degradability claim, marketers should have a reasonable basis, supported by reliable scientific evidence, to conclude that the product or packaging will ultimately entirely return to elements known in nature. Because degradation may occur over a lengthy period of time, qualifiers should disclose the maximum level of degradation a product or package achieves in testing, the test duration, and relevance of the test results to the likely circumstances of disposal.

Generally, it is difficult to establish that a product or package will degrade in sanitary landfill; since sanitary landfill remains one of the most common disposal methods, attention must be given to typical consumer expectations about the meaning of any type of degradable claim. In some instances, a product, package or component may meet relevant test methods for “degradability” when improperly disposed of rather than in a customary disposal setting. Recognising that “fugitive” waste may adversely affect the environment, identifying this feature may offer a benefit. Degradability claims should not be so framed as to incite or condone littering. Marketers may nevertheless wish to encourage consumers to dispose of the product or

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications	APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications
	<p>package responsibly, by, for example affirmatively including a statement such as “Please dispose of responsibly” or “Do not litter.” Marketers should also establish that the degradability attributes will not be harmful in customary disposal conditions, such as sanitary landfill, or compromise recycling streams.</p> <p>Degradable claims are strictly limited in some regions, particularly for plastics products and packaging, and may require use of jurisdiction-specific test methods.</p>
<p>Designed for disassembly</p> <p>A characteristic of a product’s design enabling and simplifying the process of taking apart of an assembled product into constituent components, parts and/or materials at high quality level during or at the end of its useful life in a way that allows product/material reutilisation via end-of-life options such as reuse, repair, refurbishing, remanufacturing or recycling.</p>	<p>Where appropriate, a claim of designed for disassembly should be accompanied by a statement explaining which components are involved and also specifying by whom disassembly is to be carried out (e.g., by the consumer or by a specialist). Such a claim may need to be qualified with regard to, for example, the availability of the process in question and any tools or equipment required. Consumer information on the disassembly method, etc. should be provided where appropriate and according to disassembly need. Claims about the ability to reclaim or reuse specific components should be treated similarly.</p>
<p>Extended life product/ prolonged product life</p> <p>A product designed to provide prolonged use, based on improved durability and appropriate material choice, the presence of a feature enabling it to be upgraded, maintained, or repaired and resulting in reduced resource use or reduced waste.</p>	<p>Some products are intended for prolonged use (such as an appliance). A claim of extended life dependent on upgrades should be accompanied by an explanation of the need to upgrade or take other actions (such as routine service or maintenance) to extend durability.</p> <p>A claim that is comparative by nature should meet relevant ICC Code requirements governing comparative claims. The comparative nature of many prolonged use or extended life claims requires qualification as to whether the comparison is to a competitor’s product, an earlier version of the marketer’s product, the replacement of other products or materials that perform the same function, etc.</p>

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

“Free of”, Non-toxic”, “No”, “Does Not Contain”

The absence of a chemical or substance from a product, component, or package and/or a reference to its safety from an environmental, pet or human health standpoint. To the extent the elimination of a substance requires use of a substitute, it may be necessary to disclose the use and environmental impact of the substitute.

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

A marketer may always substantiate a “free of,” “no” or “does not contain” claim by establishing that the product, component or package is not used to manufacture the product, but given the existence in nature of many substances (e.g., lead, cadmium or other heavy metals), such claims must often be substantiated by a sound scientific basis that the product, component or package contains a *de minimis* or trace amount of the substance and that the claimed substance was not intentionally added. However, a claim that the product, component, or package is “totally free of” or contains “zero” X may connote to the typical consumer that it is completely free of the substance and may be supported by evidence that the presence of the substance is non-detectable based on established testing methodologies.

Meeting established limits set by regulation does not necessarily support a “free of” or “non-toxic” claim. It may be deceptive to make a “free of” or “does not contain” claim if a product contains another substance that may be harmful to human or animal health or the environment (sometimes termed a “regrettable substitution”). Traditionally, claims that a product is “free of” a substance (such as CFCs) should generally not be made if the substance was never associated with that product or product category or if a substitute has the same or a similar impact, even if at a lower level. For example, substituting an HCFC for a CFC generally resulted in a lower impact on stratospheric ozone, but still requires a disclosure that HCFCs do have an impact on stratospheric ozone.

A marketer should be able to substantiate all environmental or health claims implied from a “free of” and similar claim.

“Not made with fossil fuels” or fossil fuel reduction claims are emerging as consumers show more concern about global warming. The marketer should have reliable evidence to support such claims.

“Microplastic-free” claims have also begun to emerge in the marketplace. At present, the regulatory framework to define microplastics remains in flux. To the extent this claim appears to imply that a product is fully degradable in some or all environments, the marketer should have reliable evidence

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Recovered energy

A characteristic of a product made using energy recovered from material, or energies which would otherwise have been disposed of as waste but has been collected through managed processes. In this context, the recovered energy may itself constitute the product.

that the product meets standards for degradability in the relevant disposal environment (e.g., returning entirely to elements known in nature). To the extent a claim appears to imply that a product does not contain microplastics or does not break down into microplastics after customary use or disposal, or after disposal in a specific environment, the marketer should have reliable evidence supporting that statement.

Recovered energy claims may be difficult for consumers and even sophisticated business customers to understand. It is important that the scientific basis for the claim is clear and transparent. Marketers making recovered energy claims should take steps to manage adverse effects on the environment resulting from the collection and conversion of waste into energy. Where appropriate, a claim of recovered energy should be accompanied by details of the type and quantity of waste used for recovery. Materials diverted from the waste stream for energy or fuel recovery should generally not be characterised as “recyclable,” but waste diversion claims may be made with appropriate qualification and substantiation.

Recyclable

A characteristic of a product, component or packaging enabling it to be diverted from the waste stream through available processes and programmes, and to be collected, processed and returned to use in the form of raw materials or products. Symbols, like the Mobius Loop, which consists of three twisted chasing arrows forming a triangle, standing alone may constitute both a recyclability and a recycled content claim.

To support a recyclable claim, the marketer should have reliable evidence that the product, component or packaging can be diverted from the solid waste stream and actually made into another useful product. There is no requirement that a recyclable product must be made into another product of the same type (for example, plastic soda bottle to plastic soda bottle) to support a recyclable claim; it simply needs to be made into another useful product (for example, plastic soda bottles are recycled and used to make garments).

Marketers should conduct due diligence to confirm that a product can be recycled in the markets where the product is distributed, and determine the relevant acceptance rates, as the relative availability of recycling facilities to consumers or communities and actual recovery and reprocessing of the item implicates the types of qualifiers that may be needed. The ultimate end user must be able to return the product for further processing, through community or curb side recycling programmes, drop-off programmes, “take-back” programmes, or other mechanisms, and products advertised as recyclable

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

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must actually have a reasonable likelihood that they can be processed into another useful product. Recyclable claims must be qualified to the extent necessary to disclose limits on the availability of recycling facilities. A product that is refillable or reusable, or that contains or is made with recycled content, is not necessarily recyclable.

An unqualified claim of “recyclability” includes the terms “recyclable,” “100% recyclable,” and “please recycle.” “Recyclable where facilities exist” is also viewed as an unqualified claim of recyclability under most guidance and requires further disclosures regarding the availability of collection facilities where they are limited.

Some areas (e.g., the U.S.) apply a “substantial majority” test, using a 60% of consumers or community standard to support an unqualified recyclable claim; others use a “reasonable proportion” standard. A qualifier about the extent of available facilities is needed if the product, packaging or component is not recyclable to a “substantial majority” or “reasonable proportion” of consumers or communities, as applicable. Marketers could state “Not widely recycled—check locally” or “Recycling facilities are limited—check locally” where a product is not widely recycled.

Recyclable claims for a product, packaging or component can be based on a “take-back” process where the producer or manufacturer of the consumer product can accept the material back for recycling into the same or another useful product. Claims that a product or package is recyclable through a take-back programme should clearly specify the product, packaging or component that is recyclable, the steps the consumer needs to take to return it to the producer or manufacturer, and limitations on availability. For example, batteries that are recyclable through participating national retailers could claim “Recyclable. Drop off at participating national retailers, including [list major partners].”

Claims should clearly specify whether the product, packaging or component is recyclable, contains recycled content, or both.

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Marketers making recyclability claims who use the Mobius Loop should remember that it is a symbol for both recycling and for recycled content.

The Mobius Loop should not be confused with material identification code markings, including the Resin Identification Code (RIC) marking that identifies a specific type of plastic that may be permitted or required in some jurisdictions. Plastic bottles and rigid plastic containers meeting certain size parameters (generally a capacity of eight ounces to five gallons) must be marked with the RIC in some jurisdictions. The RIC consists of an acronym for a specific type of plastic with an associated number from 1-7 (1-6 for the major plastic packaging resins, and then a seventh category for “7 – OTHER” resins) and may include a triangle design with arrows. The Mobius loop has a chasing arrow design where the arrows are flipped over and are relatively thick; the RIC features a simple triangle of arrows around a number from 1-7. The images below provide an example of the RIC (as embodied in most U.S. state laws), and an example of the Mobius loop. One applicable standard adopts a solid triangle design instead of the arrow design for the RIC, which is also shown below.



Even though it is not the same as the Mobius loop, the conspicuous use of the RIC marking—such as on the front label, in close proximity to the product name and logo—could be interpreted to convey a recyclable claim. However, inconspicuous use of the RIC alone does not constitute a claim of recyclability. No claim of recyclability should be made, including through prominent depiction of the RIC or association of the RIC with a recyclable claim, unless appropriate substantiating data exists and, as needed appropriate qualifiers are provided.

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Recycled Content, Recycled Material and Recovered Material

These three claims are closely related.

a) Recycled content

The proportion, by mass or weight, of recycled material recovered and used in a product or packaging. Only pre-consumer and post-consumer materials are considered as recycled content. Pre-consumer material means material diverted from the waste stream during a manufacturing process and not reclaimed as part of that same process. Post-consumer material means material generated by households or other end-users (including business users) which can no longer be used for its original purpose. Regrinding, reusing, and reprocessing waste or scrap within the same process does not generally qualify as pre-consumer material, but takeback of scrap from downstream users does.

While recycled content claims have typically been based on the recovery of physical waste and processing of that waste into another physical product, chemical recycling is an emerging technology that is increasingly recognised. Recovery of materials from the waste stream and reprocessing them to make new useful products (excluding energy or fuels) may support a recycled content claim on downstream products made with chemically recovered material.

b) Recycled material

Material that has been reprocessed from recovered (reclaimed) material by means of a manufacturing process and made into a final product, material or into a component for incorporation into or attribution to a product.

If there is any likelihood of confusion about what the Mobius loop conveys (e.g., recyclable, recycled content or both), the precise meaning of the symbol should be clarified by an explanatory statement, e.g., the words “recyclable” (with appropriate qualifiers) or “x% recycled content.” If there is any likelihood of confusion about whether the symbol relates to the product or the packaging, it should be accompanied by an appropriate qualifier.

An unqualified claim of recycled content should not be made unless all, but an insignificant amount of the product or package is made of recycled content; otherwise, a percentage qualifier by weight is needed. As indicated above, the Mobius Loop may be viewed to constitute both a claim of recyclability and a recycled content claim and should be accompanied by an appropriate qualifier as necessary. Claims that a product contains “up to” a specified percentage of recycled content may be deceptive depending on the amount involved; claims specifying the minimum amount of recycled content the product or package contains are often preferred.

With advanced recycling (sometimes called molecular or chemical recycling), waste products are diverted from the waste stream, recovered and returned to a molecular state for further processing into other useful products. Much as electricity derived or generated from renewable energy sources is indistinguishable from electricity derived from conventional sources once it is introduced into the electrical power grid, materials that undergo chemical recycling are indistinguishable from virgin materials. However, by diverting waste, chemical recycling reduces waste and the resulting material qualifies as “recycled content” in the same way that traditional physical waste products do. Measuring the mass of recycled material used to support a recycled content claim, including claims based on advanced or chemical recycling technologies, can be accomplished in many different ways. Use of an annual weighted average is generally an acceptable approach to substantiating claims for many products made with physically recycled materials. More complex mass balance calculations may be needed to support claims where recycled content is developed using technologies, such as molecular recycling, to account for yields and losses as the material is reprocessed and to allocate or attribute the recycled material to the production of a specific product.

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c) Recovered (reclaimed) material

Material that would otherwise have been disposed of as waste or used for energy recovery but has instead been collected and recovered (reclaimed) as material input, in lieu of new primary material, for a recycling or manufacturing process.

Reduced energy consumption (energy-efficient, energy-conserving, energy-saving)

Reduction in the amount of energy consumed by a product performing the function for which it was designed when compared with the energy used by other products performing the equivalent function. Claims in this category relate to energy reduction in the use of goods and delivery of services, but not in the manufacturing process of a product or its packaging. Such claims are comparative by nature and should fulfil the appropriate requirements

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For example, claims that a product is made with recycled content based on molecular recycling could be supported by evidence that 1) the waste materials used were diverted from the waste stream, 2) the waste materials were reprocessed to a molecular state, and 3) the amount of material so created from the waste is allocated or attributed to the creation of new products such that double counting cannot occur. A traceable, auditable method of tracking inputs, losses, yields and uses would typically be needed to support claims of recycled content based on molecular recycling.

A material must be recovered or diverted from the waste stream or be reclaimed and used to make a product to be considered “recycled content.”

To the extent a claim includes specific reference to pre-and post-consumer content, the specific claim about the source of the recycled content (e.g., “100% recycled content; 60% post-consumer content”) must be substantiated. There may be differences between how different jurisdictions define pre- and post-consumer content. For example, ISO includes material returned from distribution chains as “post-consumer” material.

In some jurisdictions, material that is customarily put back into the manufacturing stream as an ordinary economic practice cannot be claimed as recovered or counted towards recycled content.

In some jurisdictions, and for some product categories, energy use, consumption, efficiency and savings claims are highly regulated. Product categories may include appliances, light bulbs, cars and home insulation. Marketers should adhere to local requirements governing testing, labelling and advertising of such products.

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Reduced resource use

A reduction in the amount of material, energy or water used to produce or distribute a product or its packaging or specified associated components. This claim is comparative by nature and should fulfil the appropriate requirements.

Reduced water consumption (water-efficient, water-conserving, water-saving)

Reduction in the consumption of water associated with the use of a product performing the function for which it was designed when compared with the amount of water used by other products performing an equivalent function. Claims in this category relate to water reduction in the use of the product, but not in the manufacturing process of the product or its packaging. Such claims are comparative by nature and should fulfil the appropriate requirements.

Renewable material

A characteristic of a product or package that derives from use of biomass (material of biological origin) that comes from sources that are continually replenished at a rate equal to or greater than its depletion.

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Marketers may reduce the use of certain resources in many different ways. For example, a food company could reduce the use of water during food processing by new equipment or processing procedures or could reduce the weight of packaging by adopting a new design, resulting in less material that might have to go to solid waste. A claim of reduced resource use should generally be expressed in terms of percentage reduction. The percentages for product and packaging should be stated separately and not combined.

When a claim of reduced resource use is made, the type of resource concerned should be stated, and the percentage reduction should be expressed separately for each resource (e.g., water, energy, raw materials, fossil fuels, etc.). If the claimed reduction causes an increase in the consumption of another resource, the resource affected, and the percentage increase should be stated.

Vague and non-specific claims such as uses “less” raw materials, water, energy or the like, or general statements such as “source reduced,” are unlikely to provide adequate information to a consumer based on the inherently comparative nature of the claim.

Reduction in the amount of water used in processing may offer significant benefits and can be truthfully communicated, with appropriate qualifiers (such as percentage reduction or savings) and clear comparisons (e.g., to earlier versions of a product or to a competitor’s product), in advertising, provided the claim can be properly substantiated.

An unqualified claim of renewability should not be made unless the product or package consists of 100% renewable content, excluding minor, incidental components. Qualifications should reference the percentage of renewable materials as compared to the total mass if this threshold is not met.

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

Claims that a product contains “up to” a specified percentage of renewable material may be deceptive, especially if the range of renewable material used is broad; claims that a product contains a minimum amount of renewable material are preferred. Use of an annual weighted average is generally an acceptable approach to substantiating claims.

Not every use of biomass or a biobased material constitutes use of a “renewable” material; a material is renewable if the resource is managed to assure that it will not be depleted. While crops such as corn are understood to be grown annually, and trees are understood to have a much longer growing period, reference to the timeframe in which the product may be renewable may be appropriate if consumers may not understand the timeframe at which the resource is replenished. Note that some jurisdictions may offer government-sanctioned programmes to promote the use of “biobased” materials; marketers should not expressly or impliedly claim they meet standards of a government program if they do not and may not use a government seal without authorisation.

Renewable energy

Renewable energy is electricity derived from sources that are constantly replenished. Energy derived from fossil fuels such as petroleum or coal are not renewable sources. Wind, solar and geothermal energy are examples, but other sources, such as biomass or hydroelectric, may also be deemed renewable. Local requirements should be consulted to identify specific sources deemed renewable.

Electricity derived or generated from renewable energy sources is indistinguishable from electricity derived from conventional sources once it is introduced into the electrical power grid. Consequently, claims about use of renewable energy or power should be substantiated through contracts with electrical utilities, renewable energy certificates (RECs) or similar mechanisms that prevent “double-counting.” No express or implied claim that a product was manufactured, or service provided with renewable energy should be made unless 100% of the energy used to produce the product or offer the service can be traced to renewable energy sources; otherwise, qualifiers should be used. Marketers may reduce the risk that consumers will be misled as to the type of renewable energy by including that information in the claim. Unqualified claims about “hosting” a renewable energy facility may be viewed as deceptive if the energy is sold to other users.

SELECTED ENVIRONMENTAL CLAIMS in Marketing Communications

Reusable, Refillable

Reusable and refillable claims share common features.

a) Reusable

A characteristic of a product or packaging conceived and designed to accomplish within its anticipated life cycle more than one application, rotation or use for the same purpose for which it was conceived.

b) Refillable

A characteristic of a product or packaging that can be filled with the same or a similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing. The marketer should generally also provide a means for the product to be refilled.

Source reduction and waste reduction

Source and waste reduction claims share common features.

a) Source reduction

Reduction in size, weight, volume or toxicity of a product or package. This claim is comparative by nature and should fulfil the appropriate requirements.

b) Waste reduction

Reduction in the quantity (mass) of material entering the waste stream as a result of a change in a product, process or packaging, but excluding the in-process re-utilisation of materials. This claim is comparative by nature and should fulfil the appropriate requirements.

Waste may include discharges to air and water as well as solid waste from processes, and waste reduction may occur at the production, distribution, use and disposal stages. Claims may be based not only on a reduction of water use or the amount of solid waste, but also on a reduction in mass through waste treatment processes. A reduction claim may also relate to the transfer of waste to other users who intend to utilise it for a constructive purpose.

APPLICATION OF ICC PRINCIPLES AND OTHER CONSIDERATIONS in Environmental Marketing Communications

No product or packaging should be described as reusable or refillable unless it can be reused or refilled for the same or similar purpose. Such claims should be made only where programmes, facilities or products exist for the same purpose. If there is a limit, based on safety, quality or other reasons, on the number of times the product or package may be reused or refilled, those limits should be clearly disclosed.

Vague and non-specific claims such as uses “less” raw materials, water, energy or the like, or general statements such as “source reduced”, are unlikely to provide adequate information to a consumer based on the inherently comparative nature of the claim. Source reduction may be measured through a package weight per unit or use of the product approach, as well as physical reduction of material in, for example, packaging.

Certain new technologies, such as chemical recycling, may allow for diversion of plastic products from the waste stream to produce a variety of new, useful products. Marketers claiming that a specific amount of waste was diverted from, e.g., solid waste, or substitute for virgin or fossil fuel-based materials, should have reliable evidence supporting the amount of the waste reduction. Consistent with the general provisions of this Framework and the Code, marketers should be careful not to overstate the impact of the diversion or reduction.

ANNEX 1 ENVIRONMENTAL CLAIMS CHECKLIST

This checklist is intended to assist marketers, communication agencies and other practitioners in identifying when they are making an environmental claim and offers guidance on questions about such claims. The checklist is designed to serve as a screening check for practitioners to help identify a number of claims and considerations in making claims. Additional guidance is provided in Part 1 and Part 2 of the Environmental Framework. Environmental claims may apply to goods (including packaging or components), as well as services, product lines, or to an organisation or facility.

> Do your proposed claims address:

- The effect of the product, component or package on solid waste?
- The effect of the product, component or package on water?
- The effect of the product, component or package on air (smog, stratospheric ozone, nitrogen oxides (NO_x), sulphur oxides (SO_x), etc.)?
- The effect of the product, component or package on climate (greenhouse gases, carbon offsets, carbon removal, carbon neutrality, climate positivity, etc.)?
- The effect of the product, component or package on energy usage?
- The effect of the product, component or package on wildlife and biodiversity?
- The effect of the product, component or package on human health?
- The overall effect of the product, component or package on the environment?
- The absence, reduction or presence of a specific substance?
- The “sustainability” of the product, component or package?
- Whether the product, component or package is made with or from renewable material or renewable energy?
- Whether the product, component or package contains, is made with, or derives from or can be attributed to recycled material?
- Whether the product, component or package is recyclable?
- Whether the product, component or package is compostable or biodegradable?
- Whether the product or package is reusable or refillable?
- The future environmental benefits or goals of the organisation?
- Other claims implicating the impact of your products or operations on the health of the planet, the environment or the climate?
 - You are making an environmental claim and should evaluate the net impression of the advertising to assure that it is not deceptive or misleading to the intended target audience.

> 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?
 - You are making an environmental claim and should evaluate the net impression of the advertising to assure that it is not deceptive or misleading to the intended target audience.

> Are your proposed claims subject to any mandatory regulations or legislation?

- You may be subject to more stringent or specific disclosures in advertising and labelling or may be required to substantiate certain claims using specific standards or methods.
- Are your proposed claims specific and unambiguous? Vague and non-specific claims are

likely to be misleading and should be avoided.

- Your ability to make a claim suggesting a unique benefit when actions are required by law may be limited.

> Does the claim clearly indicate if it applies to the product, the packaging, or both, or to components or materials? Does the claim indicate if it applies to the entire product line? To a facility? To the entire organisation?

- The claim should clearly identify the subject of the claim (product, facility, organisation), and what environmental attributes are involved.

> Do you have a reasonable basis for the express and implied claim(s) you are making? Did you have substantiating scientific data supporting the claim at the time the claim was made? Does the data reflect sound scientific principles likely to be accepted by experts qualified by education, training, and experience in the field? 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?

- Any objective performance claim likely to be material to a consumer, such as a claim about environmental benefits of a product, package, component, service, facility or organisation, or detriments of a competitor's product, package, component, service, facility or organisation, should be supported by relevant test data, analyses or similar information at the time the claim is made.

> Are your proposed claims verifiable based on appropriate test methods or scientific data?

- What is the test method used? Is it recognised by government agencies or reputable standards organisations?
- 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 package for which the claim is made (or one substantially identical) been tested? Is the information provided understandable to the typical consumer, avoiding confusing jargon?
 - Standards and test methods must be reasonable and appropriate, and results provided must be clearly presented. Tests should be conducted on products or samples of products for which the environmental claim is made.
 - Data should be presented in a way that does not exaggerate the validity of the product claim

> Are you making a general claim that the product, component or package is "good" for the environment based on a single attribute (e.g., "eco-safe," "earth friendly," "environmentally friendly," "sustainable," "green," "carbon neutral" and similar claims)?

- Since environmental impacts encompass a multitude of criteria, a general claim of environmental benefit linked to a single attribute is likely to be misleading unless the relationship is specific and clear.
- Claims about the benefits of carbon or greenhouse gas reduction actions should be transparent and clearly specify whether the claim involves actions to reduce carbon dioxide or all greenhouse gases, and, if the claim applies to only portions of the product's life cycle, which portions.

- > **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.

- > **Are you making a claim based on the product life cycle? What stages of the life cycle are considered (e.g., raw material production, manufacturing, transport to market, disposal)?**
 - Most guidance on environmental claims does not address claims based on life cycle analysis (LCA). The results of an LCA may depend on the inputs. Marketers should ensure that the scope of an LCA adequately covers the expected environmental impacts of the product. If an LCA is used to support comparative claims, the identical inputs should be included in the comparative analysis. The products or services involved should also be of the same type or category for the comparison to be fair, and disclosures of material differences in the compared products may be required.

- > **Does the claim relate to health, safety or other benefits apart from environmental benefits (this might include “free” claims as well as claims such as “safe”, “safer”, “non-toxic”, “pesticide-free” or “organic”)?**
 - Express or implied health claims must have a reasonable basis. To meet that standard, each claim may have to be independently substantiated with appropriate scientific research or support.

- > **Do you state or imply that the product, component or package was made with renewable material or energy?**
 - An unqualified claim of renewability should not be made unless the product or package consists of 100% renewable content, excluding minor, incidental components.
 - Claims about use of renewable energy or power should be substantiated through contracts with electrical utilities, renewable energy certificates (RECs), etc.

- > **Do you state or imply that the product, component or package has recycled content or is recyclable?**
 - Is it clear which claim is made? Is the extent of the claim also clear?
 - Since the Mobius loop standing alone may indicate recyclability and recycled content, further disclosures may be needed if the product or package is recyclable but does not contain recycled content, unless applicability of the claim is clear from the context.
 - If you make a recycled content claim, does the product, package, or both contain actual or attributed recycled content?
 - Marketers must be able to trace and quantify yields and losses in the recycling process to support the claimed amount of recycled content in or attributed to a product or package.

- If you make a recyclable claim, is it clear if the product, package, or both are recyclable?
 - When a product is labelled as “recyclable,” or the common symbol, the Mobius loop, appears on the product or package, a consumer may not understand whether the package, the product itself, or both are recyclable. Also, the consumer may not understand whether the product or package is merely capable of being recycled or can actually be recycled in the local community.

- > **Do you state or imply that the product, component or package is compostable or degradable?**
 - Marketers making compostable claims should have appropriate scientific evidence that all the materials in the product or package will break down into or otherwise become part of usable compost in an appropriate composting facility or device in a timeframe consistent with other materials composted under the same conditions. If the product is compostable only in certain environments, qualifiers should be included.
 - A general degradability claim should not be made unless the marketer has reliable evidence that the product or package will entirely break down and return to nature in all potential disposal environments. Appropriate qualifiers are needed. Degradability claims should not be so framed as to incite or condone littering.

- > **Do you state or imply that the product or package is refillable or reusable?**
 - No product or packaging should be described as refillable or reusable unless it can be refilled or reused for the same or similar purpose and there is a reasonable means for the consumer to do so.

- > **Are your proposed claims comparative in nature? If so, is the comparison to:**
 - An earlier version of the product, component or package?
 - A competitive product, component or package?
 - The basis for any comparison regarding environmental benefits, attributes or burdens should be clear and the conditions of use of the compared product, component or package substantially identical.

- > **Must the consumer be able to access external facilities (e.g., recycling infrastructure, home composting, municipal composting, etc.) so that the claimed benefit can be achieved? If so, are these facilities reasonably available to the requisite number or proportion of users, consistent with local guidance?**
 - Limitations on the ability to, e.g., recycle or compost the advertised item should be clearly identified.

- > **Have you conducted consumer perception research to assess how the claim will be perceived by consumers?**
 - Remember that the evaluation of marketing communications, including advertisements featuring environmental claims, is based on the net impression of the reasonable consumer or target. Perception research is not mandatory; if not available, the evaluation will be based on a hypothetical assessment.

- > **If the claim is literally true, could it be misinterpreted to convey a broader benefit? Does it exaggerate the environmental benefit or features?**
 - Remember that the evaluation of advertisements, including advertisements featuring environmental claims, is based on the net impression of the reasonable consumer or target.

- > **Is the claimed benefit likely to be realised when the product, component or package is actually manufactured, used or disposed?**
 - An ad that makes a claim about a feature or benefit that would not likely be achieved in the actual manufacture, use or disposal is likely to be misleading and/or deceptive absent appropriate qualifiers.

- > **Does the claim involve an environmental commitment or goal that is aspirational in nature and not likely to be met until many years in the future?**
 - An aspirational claim requires that the company demonstrate that it has a reasonable capacity and methodological approach to meet the claimed commitment or goal.

- > **Do you use your own environmental seals or logos?**
 - If a consumer might interpret your own environmental seals and logos in environmental advertising to denote approval by an independent third party, it is likely to be misleading and/or deceptive.

- > **Do you use seals or logos of third-party organisations? Are their procedures transparent? Are processes for standards adoption in line with recommendations of competition authorities? Will seals and logos be misinterpreted to connote broader environmental benefits than covered by the programme?**
 - Independent seal organisations should adhere to fair processes in the development of standards. Failure to do so may implicate competition law considerations.
 - Marketers should adhere to the standards and guidelines of the seal organisations in using a seal.

- > **Are appropriate qualifiers clear and prominent, and in close proximity to the relevant claim?**
 - Qualifiers should generally be presented in readable typeface in a location in close proximity to the claim.
 - Consumers are now broadly accustomed to obtaining more information from visiting websites. However, qualifying information must be readily available in close association with the claim. Prompts encouraging consumers to visit a website for more information, or making QR codes and the like available, may be helpful to consumers, but they may not substitute for required qualifiers that must appear prominently and in close proximity to the claim.

- > **Do you periodically reassess the claim, especially a comparative claim, based on changed circumstances and developments to assure that it remains accurate and not misleading?**
 - Claims must be current and comparisons clear.

- > **Are in-house marketers and outside marketing agencies trained to understand legal requirements and recommended best practices in making environmental and sustainability claims?**
 - Training and education regarding good advertising practices is recommended for all marketing communications.

- > **Do individuals represented as environmental experts in marketing communications actually have the relevant education, training and experience in the field?**
If not (for example, if actors are portrayed), are appropriate qualifiers included?
Do endorsements and testimonials related to environmental claims meet applicable guidelines for endorsements, and include material connection disclosures as needed?

ABOUT THE INTERNATIONAL CHAMBER OF COMMERCE (ICC)

The International Chamber of Commerce (ICC) is the institutional representative of more than 45 million companies in over 100 countries. ICC's core mission is to make business work for everyone, every day, everywhere. Through a unique mix of advocacy, solutions and standard setting, we promote international trade, responsible business conduct and a global approach to regulation, in addition to providing market-leading dispute resolution services. Our members include many of the world's leading companies, SMEs, business associations and local chambers of commerce.



33-43 avenue du Président Wilson, 75116 Paris, France
T +33 (0)1 49 53 28 28 E icc@iccwbo.org
www.iccwbo.org @iccwbo

