

# Assessment of Green Claims in Marketing: Summary for Policy

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## **EV0430 Assessment of Green Claims in Marketing**

**Final Report to the Department for Environment, Food and Rural Affairs**

**October 2009**

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# Contents

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Introduction .....	1
Methodology.....	1
Key Findings .....	2
(a) Trends in green claims 2006-09.....	2
(b) Perspectives from Industry.....	4
Reflections & Recommendations.....	6

# Summary for Policy

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## Introduction

This project, undertaken by Brook Lyndhurst, Icaro Consulting and AAI+Friends on behalf of Defra, explored 'green' claims in advertising from two different perspectives: first, from the perspective of statistical data to explore headline trends over time; second, from the perspective of the advertising and marketing community. The purpose of the research is to support the development of the Green Claims Code (GCC), by providing a robust evidence base that will help inform Defra's forthcoming revisions to the Code and practical guidance.

This project had 3 main objectives:

1. To get an overall picture of the extent of green claims found in advertisements, including in the press, on TV, on the radio and, if possible, on websites. This does not include claims made on product packaging or within company reports;
2. To identify in which sectors, services and products such claims mostly appear, and to understand the context of the identified claims; and
3. To engage with advertisers and their agencies in order to gather their views on green claims; what claims and terminology they use and why, what evidence they use to make those claims and to raise awareness of the Green Claims Code.

## Methodology

The research involved a multi-methodological approach, combining statistical interrogation of datasets alongside stakeholder engagement workshops.

The **statistical analysis** involved a search of Xtreme Information's library of adverts to identify recorded green claims over the year period Jan 2006 – March 2009. This entailed establishing a list of 40+ environmental search terms and, using these terms, a total of 4,083 adverts carrying green claims were identified from (from a total of 598,134 adverts held by Xtreme). Of these 4,083 ads, a random sample of 1,000 was purchased to undertake more detailed analysis of the content of the ad, including imagery, terminology and third party endorsement.

The main caveat in relation to the database is the initial coding and classification process – a green claim is only classified as such if the green information forms the *main* or *a key* part of the ad's message. Supplementary green information - for example that which is confined to a footnote or a smaller element of the ad – is unlikely to have been captured in the database (and hence in the analysis that follows).

*The **stakeholder workshops** comprised five sessions, four in London and one in Manchester, and divided according to industry sector (e.g. transport/automotive, energy & utilities, etc). The target audience for these workshops were mainly client companies and brand communication agencies of all types from advertising to pack designers. A total of 143 delegates attended, and guest speakers included representative from Proctor & Gamble, British Gas, British Telecom, The Co-operative Bank and Shell.*

## Key Findings

### (a) Trends in green claims 2006-09

- Over the period January 2006 – March 2009, Xtreme Information catalogued almost 600,000 adverts. Of these, just over 4,000 carried a green claim, comprising 0.68% of all ads (varying between 0.33% in Q1 of 2006 to 1.14% in Q3 of 2007).
- Green claims have been subject to changes over the period, with a notable and rapid growth in claims between 2006 and 2007/8 (during which time they roughly tripled in number), although they have since fallen back, coinciding with the worsening economic climate.
- Green claims in advertising have largely appeared in print media, which accounts for over two thirds (68%) of claims made. This is out of synch with the trend for advertising in general, where TV and the Internet account for a considerably larger share<sup>1</sup>. Green claims are clustered in the quality newspaper titles (suggesting that they are targeted at an up-market and influencer segment of the public, rather than mass-market).
- Looking at the sectors making green claims, three are especially prominent – the public sector, energy and automotive. Among these sectors, green claims account for a significantly higher share of all claims than the overall figure of 0.68% (presented above). For example, in the automotive sector ads carrying a green claim account for 2.69% of all car ads. In spite of the prominence of these sectors, it is clear that the number of organisations making some green claims extends much further. Indeed, a wide range of organisations and/or sectors has made green claims, even if only a few in number.
- Almost two thirds (61%) of green claims relate to the promotion of a specific product or service (i.e. that a consumer can purchase). In contrast, close to one in five (21%) relates to the broader brand and its corporate social responsibility; while a similar proportion conveys public information, such as recycling campaigns. The purpose of a green claim varies significantly according to the sector making the claim. For example, brands within both the banking/finance and automotive sectors predominantly make green claims that relate to specific products and services, whereas brands within the corporate energy sector are much more likely to make claims relating to their broader CSR and brand reputation.
- Just over a third of green claims (37%) trade on an environmental message alone, with the other two thirds trading on a green message in combination with an additional feature – most commonly 'green & cost' and 'green & performance'. This again varies by industry sector, with green claims in public information ads dominated by 'green alone', whereas the banking/financial and consumer utilities sectors are more likely than others to use the 'green & cost' theme. The automotive sector tends to focus on green messaging in the context of both cost and - especially – performance. The type of green message has also varied across time, with the combination of 'green & cost' increasing in significance from 2008 onwards.
- Looking at the specific features of a green claim, the research shows that:
  - There is no single convention for the use of green colour or green imagery to support a green claim. In both instances around one in three ads making a green claim do not have any green colouring or imagery, and among those that do there is considerable variation in the prominence/subtlety of its role.
  - Turning to imagery, cars are the most frequent 'motif', reflecting the prevalence of ads from the automobile industry. A long list of other motifs are also evident - images of children and animals appear frequently (and may indicate a trend towards emotional-based green advertising), as do natural images of landscapes and the countryside. Wind

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<sup>1</sup> Advertising Association, March 16, 2009

turbines and light bulbs, also prominent as green motifs, are employed in direct relation to energy claims, as well as appearing as a broader 'green' symbol.

- Only a relatively low proportion (13%) of adverts making green claims identifies a third party organisation supporting the claim being made.
- Small print in adverts is, as expected, fairly common, appearing in just less than half (42%) of adverts making green claims. However, only 17% of ads involving a green claim have 'green' small print which relates to the claim being made (and around half of these are the result of the mandatory requirements placed upon the automotive sector).
- The general notion of 'green' appears most frequently as the overarching concept behind green claims. This is closely followed by waste/recycling, a financial incentive, energy efficiency and carbon. Energy and renewable energy are also prominent.
- Looking in more detail at the most prominent concepts, it is possible to disaggregate the concepts into their constituent elements. For example, there are many manifestations of 'carbon' in green claims - most frequent is 'carbon footprint', followed by 'CO2 emissions'. The term 'carbon' alone features relatively rarely, whereas it is more frequently used in derivatives such as 'carbon emissions', 'carbon neutral', 'low carbon', and 'carbon capture'. Recycling has much fewer constituent elements, with 'recycling' accounting for over two thirds, followed by 'waste' and – much less prominently - 'packaging' and 'compost'. In contrast, no further break down is possible for other concepts – notably 'green', financial/cost saving' and 'energy efficiency' – which are used as broad, generic themes as opposed to an umbrella term under which different constituent elements can be identified.
- An analysis of how the use of green concepts varies across sectors demonstrates that individual sectors tend to focus on a much more streamlined and specific series of concepts. For example, consumer utilities draw largely upon five core concepts - 'energy efficiency' and 'energy' come first (displacing 'green' as the main concept), along with 'renewable energy' and 'financial incentive'. The automotive sector follows a similar pattern of clustering, with hybrid technology the main concept (and something that is relatively unique to this sector). 'Emissions', 'energy efficiency' and 'carbon' also feature strongly, as do 'green' and 'financial incentive'. An even more dramatic clustering of concepts is evident in relation to the electronics sector, which is largely dominated by the concept of waste/recycling.
- Green claims can be made in some sort of comparative fashion, or in a manner that limits or qualifies the extent of the claim. The analysis identified six different ways in which green claims are qualified in adverts:
  - *Relative qualified* – e.g. 'ranked the greenest of the major retailers by x'; 'equivalent to taking 100,000 cars off the road'
  - *Relative unqualified* – e.g. 'lower emissions', 'greener', 'reducing our impact'
  - *Selective qualified* – e.g. 'this has led to a saving of up to 100 tonnes of carbon'; 'we are investing £1 billion in alternative fuels'
  - *Selective unqualified* – e.g. 'every day we are helping to improve the energy efficiency of peoples' homes'; 'we are making strides to make our operation more efficient'
  - *Absolute and relative comparisons* – e.g. 'we are committed to selling one million vehicles with CO2 emissions below 140g/km this year, 30% more than our rival x'
  - *None* – e.g. 'environmentally-friendly', 'green'

The results show that four in ten ads (40%) carrying a green claim do not have any qualification of that claim, either because they simply state a claim such as 'green' or 'environmentally friendly' with no definition/supporting information, and/or because they

issue an instruction (e.g. particularly relevant in the case of public information ads, such as Recycle Now). Relative comparisons (e.g. "lower emissions") are relatively common, appearing in 33% of ads, but are typically unqualified. Selective comparisons (e.g. "this has led to a saving of up to 100 tonnes of carbon") also appear on a significant minority of ads (19%), but are generally qualified.

## (b) Perspectives from Industry

The purpose of the workshops was two-fold:

- First, to establish "where we are now" - in respect of both the current Green Claims Code (GCC) / Green Claims Practical Guidance (GCPG) and, more broadly, what the industry is thinking about green claims.
- Second, to explore "what happens next" in terms of encouraging the industry to make more, and better, green claims. This again involved a focus on the GCC and GCPG, as well as broader industry and Government action.

Key points made by participants in the workshops were as follows:

### **Where are we now: the industry**

- This is an important issue for the marketing community, and there is a high degree of agreement that green marketing should not be allowed to become devalued by "greenwash". There did not, however, appear to be any perception that it was being devalued, or that the Advertising Standards Authority was not adequate to cope with infringements. Delegates were aware of companies that had been adjudicated against and felt that they faced wider condemnation than for more normal product-performance claim infringements.
- Green claims in advertising to date – at least as far as mainstream agencies and brands are concerned – are felt to represent the equivalent of a "toe in the water". The peak or "flurry" of green claims in 2007 is thought to most likely represent the early "quick wins" which required little in the way of genuine product/brand shifts.
- Confusion around green claims, both within the industry and among consumers, remains a barrier, particularly in relation to green terminology. Delegates felt that the industry is also cautious about making green claims - which can be characterised as a 'fear to tread' – and that this is true of even the more experienced brand owners.
- There is a diverse range of practices for developing and managing green claims. At one end of the spectrum, organisations (typically those which are smaller) have no bespoke process in place. In contrast, others have a well developed process and engage with a variety of internal and external stakeholders. Analyses such as Life Cycle Analysis are clearly an "advanced" activity at present.
- While there is some surprise among the industry at the low proportion of green claims relative to all claims, the distribution of claims over time is less surprising, particularly the fall in the number of green claims recently in response to the recession.
- In terms of future trends, there is a sense that the next phase of green claims will reflect a shift away from looking for "quick wins", towards brands making strategic and longer term decisions about how their brand "fits" with environmental responsibility.

## Where are we now: the existing Defra Code and GCPG

- Awareness of the GCC is low, and few have used it. Marketers generally see CAP / BCAP as the regulations they have to follow.
- There is a need for more obvious and visible coordination with other codes and other organisations working in this area.
- The existing GCC and practical guidance appears to be caught trying to be two separate things – guidance and help on the one hand, and regulatory requirements on the other.
- The Code focuses on things not to do, rather than pointers on what to do – especially in relation to which green terms to use.
- The content is satisfactory but the presentation of the material is 'dry' and is not well suited to engaging agencies and brand managers.
- The GCPG was criticised as being not sector specific enough to offer the bespoke advice that organisations are looking for.

## What next?

### (a) The industry

- There is a high level of agreement that brand reputation plays a key role in green claims, and that brand managers need to ensure that environmental considerations are integrated within the brand's organisational 'DNA', rather than treated as a bolt on.
- A reasonable body of knowledge is starting to emerge within the industry on some of the pitfalls to avoid in making a green claim, including the use of overly vague or overly specific terminology, descriptions with little meaning to consumers (e.g. 1 tonne of carbon), overly selective claims, and claims based only on meeting minimum legislative requirements.
- A number of potential actions for the industry were raised, including: work to better substantiate claims; the development of better visual tools (e.g. A-G scale); rationalising green information and terms; and tying into the behaviour change agenda by matching specific products with specific actions, e.g. Ariel's Turn to 30°.

### (b) GCC / GCPG

- There is a loud and consistent call for a more accessible, interactive and online format for the guidance (e.g. a green claims "Wikipedia"/version of "NHS Direct").
- There is strong demand for more specific and bespoke detail, structured around a series of "access points" – according to industry sector, specific issues, and an organisation's 'experience level' in making green claims (i.e. baby steps, teenager, adult, old sage, etc) – to enable marketers to 'dip in and out of' the guidance.
- There is also demand for more case study examples of ads, industry examples of how companies have gone about developing and deploying green claims, a check list of questions that they need to ask in developing a claim, and detail on 'preferred' green terms.
- An annual review is suggested as way of ensuring the guidance stays up to date and keeps pace with emerging issues and new measurement techniques.

(c) Wider support

- There is an eagerness among delegates to stay involved in the process. For example, Defra could plot consumers' journey on green issues, including its behaviour change objectives, and share this with the industry. There may also be scope to use the behaviour change goals to set industry challenges (in return for awards), and to share research on consumer attitudes.
- There is broad support for initiatives that lead to greater standardisation and benchmarking, including the possibility of some form of sector-specific labelling scheme, kite mark or 'stamp of approval' to indicate innovations in the field of making green claims.
- In terms of engaging the industry, it is suggested that Defra ensure the involvement of the representative trade bodies (e.g. IPA, ISBA), hold more workshop sessions (as in this research), target agency heads, and "Get the right people involved" (e.g. set up a working party of experts handpicked from Defra, leading ad agencies and leading brand owners).

## Reflections & Recommendations

This research was deliberately intended to gather and present a variety of data in a relatively detailed fashion. It is the detail of the work, rather than an analysis thereof, that provides Defra with the material it needs to develop its future support for and/or engagement with 'green claims'.

Nevertheless, the research team has had the opportunity to make a number of reflections on the findings from the work, and these are presented below. These led us to a concise series of conclusions and recommendations for action by Defra and these, too, are presented below.

### Reflections on the Findings

Our overall interpretation of the results leads us to three key reflections.

1. The Issue of Scale

The number of green ads, representing less than 1% of total ads, is much smaller than both we and delegates at the workshops had expected. We have not had the opportunity in this study to explore in any depth the reasons for the low volume of green ads, but from the workshops it would appear that an underlying lack of consumer interest and an industry 'fear to tread' are largely to blame.

2. The Fear to Tread

A strong and clear refrain through the workshops was the notion of a 'fear to tread' among delegates. That is to say, for many sectors, many companies and many products, the perceived risks of making green claims – notably of being accused of 'greenwash'; of falling foul of the ASA; and of using images or language that alienate consumers – outweigh the perceived benefits.

3. The Call for Guidance and Support

Although there are many other factors that will influence the future trajectory of green ads – not least the development of the wider economy over the next few years and the shape of consumer preferences within that wider development – there was a strong and consistent call for improved guidance and support.

## Conclusions

On balance, we concluded that:

- **corporate leadership** on green issues is an important component of moving consumers generally towards a broader set of pro-environmental behaviours; and mechanisms that enable businesses to demonstrate that leadership, even in advance of 'traditional' consumer demand, are therefore justified
- a **responsive consumer market** is essential to reward the, sometimes very expensive, research and development required. Greening the supply side must be synchronised with consumer demand to be sustainable
- Defra is ideally positioned to play an **enabling role**, and the Green Claims Practical Guidance (together, potentially, with additional devices) offers a mechanism for allowing Defra to help businesses to develop their environmental leadership functions
- this role should not be passive but should be an **active effort**, at least in the short and medium term, not least because the 'fear to tread' is likely to take some while to overcome. The aim should be to turn "Fear to Tread" into "Dare to Tread" through actions to both make compliance easier (though not less exacting) and desire to promote on a green platform more attractive.

## Recommendations

### Recommendation 1 - Consolidating green terminology and language

We judge that there is research work to be done to better understand what UK consumers make of the proliferation of green terms, and which terms 'speak' loudest to them in terms of encouraging pro-environmental choices and behaviours.

### Recommendation 2: Improving the Green Claims Practical Guidance (GCPG)

Defra should redefine its role as a provider of insight and guidance in support of the self-regulation system. We believe this would allow the Defra GCPG to become a more broadly useful document than code owners are likely to be able to provide. Defra should be the expert on defining terminologies and how ideally they should be supported. Creating understanding of the specific support required to justify a claim is felt to be a very desirable development.

We recommend that the new CGPG should be re-developed professionally as an online "Toolkit", with hard copy versions of the key parts only and far more comprehensive online guidance. It should be put out as a tender to competent suppliers for the design and construction and ongoing maintenance. The content should be reviewed on an annual basis and updated as necessary. This could be as part of ongoing marketing sector liaison to be discussed below.

### Recommendation 3: Industry engagement

Following the interest expressed by many workshop respondents to remaining involved with the issue, we recommend holding a Green Claims day each year together with leading marketing and advertising representative organisations to review latest judgements, look at interesting cases, review terminologies and hear latest successful case histories in green advertising.

#### *Information provider*

We believe Defra can confirm its leading position in green issues by becoming an information provider, sharing consumer research and behavioural information that is beyond many marketers and unavailable commercially.

#### *Educator*

To build awareness of sustainability issues in marketing over time seems to us to require integration in training courses, especially those offered by IPA and CIM, but also in university marketing curricula.

#### *Rewarder*

Though one can say there are many awards, there are few that are specific enough to really focus on green issues. We believe that Defra should be looking to endorse award schemes that meet strict criteria and perhaps also to offer a Defra prize for the best winners. These could, for example, be aligned with Defra's pro-environmental behaviour goals.

#### *Leaders*

One particular form of engagement that we judge would be a very effective use of resource is the engagement of key leaders from the green claims field, many of whom have already become apparent during the course of the workshops. In the short term this group could act as a formal or informal advisory body, helping Defra flesh out the findings from this research process and translate these into firm policy actions.

#### **Recommendation 4: Projecting the Defra role**

For Defra to achieve and maintain a constant level of awareness would require a communications programme to marketers and agencies on an on-going basis. It is unlikely that professional organisations like IPA, ISBA, CIM could fund this, but they should have no objections to referring queries they receive to Defra and making their email lists available to Defra for promotion of materials and reminders of the online location of guidance materials. We recommend an email campaign at least annually designed to reach all levels of the marketing and advertising businesses.