

Guidance on 'Biodegradable' and other environmental claims in the Cleaning Products Sector

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Introduction

Who should read this guidance?

All companies that develop, manufacture or retail cleaning products and:

- Currently make environmental claims about products;
- Are considering how to market the environmental attributes of their products;
- Are receiving queries from customers about the environmental performance of their products and are considering how to respond.

Giving clear, straightforward, environmental information, as outlined in this guidance, has benefits for consumers and business alike. By providing information about the environmental effects and qualities of products, and how to use and dispose of them, environmental claims (sometimes called "green" claims) help consumers to make informed buying choices. They also help to raise awareness of the issues, enhance consumer understanding and improve product standards overall. At the same time businesses can enhance their credentials and demonstrate that they are acting responsibly to consumers, other business partners and regulators

This document is official government and industry guidance which has been developed by the Department for Environment, Food and Rural Affairs (Defra) and the Department of Trade and Industry (DTI) to provide clear, user-friendly advice for companies in the cleaning product sector who wish to make environmental claims such as 'biodegradable' about their products. *These guidelines are endorsed and supported by the UK Cleaning Products Industry Association (UKCPI).*

It covers the following areas:

- **Environmentally Friendly**
- **Biodegradable**
 - Surfactant biodegradability
 - product biodegradability
- **User information (Washright)**
- **Other Environmental Claims on Cleaning Products**

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“Environmentally Friendly”

An environmental claim that is vague or non-specific and which broadly implies that a product is environmentally friendly or benign can be misleading to consumers and should **never** be made.

“Biodegradable”

- **Surfactant Biodegradability**

Existing legislation currently sets legal requirements for the biodegradability of surfactants. If surfactants simply comply with legal requirements for biodegradability, then it is recommended that no claim should be made.

This is because such a claim would imply that the product is exceptional when in fact all products in the marketplace will share the same characteristic.

Companies are advised to apply their knowledge of existing and future legislation when considering environmental claims. Future legislation will impose far more stringent legal criteria on the ultimate biodegradability (mineralization) and will require that all surfactants rapidly biodegrade to water, CO₂ and mineral salts.

In view of these imminent legal criteria it is recommended that claims such as:

‘Surfactants used in this product rapidly biodegrade to water, CO₂ and mineral salts’

should never be used.

- **Product Biodegradability**

Companies should recognise that the concept of a ‘product’ has no relevance for the environment itself. Instead, it is the *ingredients* of the product which should be the focus for environmental improvements.

Any company that still wishes to make a claim about the biodegradability of the product should first ensure that the ingredients of the product are compliant with existing regulations relating to its environmental impact.

Claims about biodegradability should be both **specific and substantiated** as required by the UK Green Claims Code and ISO 14021.

A **Specific** claim is one which:

- Makes it clear that the claim refers to the constituents of the product and not the packaging;
- Refers to specific components of the product (other than the surfactant) which have been tested to a recognised standard (ISO 14021 sets out the hierarchy of acceptable test standards, as outlined below).

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- Specifies the ultimate biodegradation products and avoids phrases such as "harmless".

Example: Biodegradability claims

Where the claim relates to the ingredients of the product:

"After use the ingredients in this product rapidly biodegrade to [insert ultimate biodegradation product(s) eg water, CO₂ and mineral salts]."

The following claims are *unacceptable* and should be avoided:

- "Biodegradable"
- "Biodegrades to harmless components"

- **Substantiated**

Clearly any claim should be both verifiable and substantiated and this is a requirement of both the UK Green Claims Code and ISO 14021. This does not mean that claims have to be independently verified but that relevant information needs to be to hand in case the claim is questioned or challenged.

ISO14021 requires that claims about degradability should only be made in relation to a specific test method that includes maximum level of degradation and test duration. To substantiate a claim relating to biodegradability, a company should be able to provide test results. It would not be necessary to refer to the test method in the actual claim, but the test results should be made available upon request. So claims that rely on confidential information for their verification should be avoided.

The selection of test methods should follow, in order of preference,

- (i) International Standards
- (ii) Recognised standards that have international acceptability (eg CEN or BS standards)
- (iii) Methods developed by industry provided they have been subjected to peer review.

The following information should be documented and retained:

- Identification of the relevant standard or test method used;
- Documentary evidence, if verification of the claim cannot be made by testing the finished product. (Note that a claim referring to the product's environmental performance must derive from a consideration of all the individual ingredients);
- Test results, where these are necessary for claim verification;
- Contact details of any independent party carrying out the testing;
- If a claim involves a comparison with other products, then a description of the method used, test results and any assumption made should be clearly stated (It is essential that any comparative claims must be based on delivery of equal cleaning performance);

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- Evidence that the claim will continue to be accurate during the period over which the product is on the market and longer, depending on the life of the product.

Although not required, the credibility of your environmental claims will be significantly improved by two additional activities:

- Voluntarily disclosing the information necessary for the verification of an environmental claim; and
- Having your claims independently verified.

User Information (Washright)

The UK Cleaning Products Industry has developed user information for detergent products. Called *Washright*, it provides clear and easily understood information for consumers covering issues such as amount of detergent to use.



Further information is available from:
<http://www.ukcpi.org/code.htm> and <http://www.washright.com>

Other Environmental Claims on Cleaning Products

If you would like to make an environmental claim not related to biodegradability, you may find it useful to refer to more general advice produced by the Government – *Green Claims – Practical Guidance* available at <http://www.defra.gov.uk/environment/consumerprod/index.htm>.

By following this guidance, companies can ensure that self-declared environmental claims are meaningful and in line with existing standards and codes, namely the *UK Green Claims Code*¹, International Standard ISO 14021 and *European Commission Guidelines*² for making and assessing environmental claims. The guidance is not intended to replace these codes but to provide user-friendly interpretative guidance on how to apply them.

(1) <http://www.defra.gov.uk/environment/consumerprod/gcc/pdf/gcc.pdf>

(2) http://www.europa.eu.int/comm/consumers/cons_safe/news/green/guidelines_en.pdf

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