

Guidance on environmental claims on Greeting Cards



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Guidance on environmental claims on Greeting Cards

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1. Guidance on environmental claims on greeting cards

Introduction

Who should read this guidance?

All companies that produce or sell greeting cards in the UK and who:

- Currently make environmental claims eg 'recycled', 'environmentally friendly', 'from sustainably managed forests';
- Are considering how to market the environmental attributes of their cards and/or envelopes.

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 guidance which has been developed by the Department for Environment, Food and Rural Affairs (Defra) and the Department of Trade and Industry in conjunction with the Greeting Card Association ([GCA](#)) to provide clear, user-friendly advice for companies in the greeting card sector who wish to make environmental claims about their products.

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 present document is not intended to replace these codes but to provide interpretative guidance on how to apply them to environmental claims within the greeting card sector in the UK.

(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

1. Guidance on environmental claims on greeting cards

What is a self-declared environmental claim?

Any self-declared statement, symbol or graphic that:

1. refers to an environmental aspect of a product, component or product packaging;
2. is made on products, on product packaging, in product literature or advertisements³.

This is a very broad definition and most statements about the environmental aspects of products will fall under it. Within the greeting cards sector, examples would include statements about recycled material content, sustainable forestry and card or paper bleaching.

In addition to self-declared environmental claims, other forms of product environmental information and third-party schemes exist – such as ‘Type I’ eco-labels (eg, the EU Eco-label) or ‘Type III’ environmental product declarations which provide detailed quantitative information. However, these are governed by a separate ISO standard and ISO technical report (ISO14024 and ISO/TR 14025 respectively). Descriptive information on some of the label types and declarations applicable to the greeting card sector is provided in [section 4](#).

What type of claim do you want to make about your product?

1. Make a self-declared environmental claim about forest management – eg ‘one tree planted for every one cut down’, ‘from sustainably managed forests’
 - Go to Section 2
2. Make a self-declared claim about the other environmental properties of the product – eg, ‘recycled’, ‘environmentally friendly’, ‘non-chlorine bleached’
 - Go to Section 3
3. Consider using an existing labelling or product declaration scheme – eg, the EU Eco-label, Paper Profile
 - Go to Section 4

(3) Claims made in advertisements are furthermore covered by the British Codes of Advertising and Sales Promotion (<http://www.asa.org.uk>) and the ICC International Code of Environmental Advertising (http://www.iccwbo.org/home/statements_rules/rules/2001/code_of_environmental_advertising.asp).

2. Self-declared environmental claims: Forest management

This section provides advice on how to make good environmental claims relating to forest management. Claims relating to the standard of forest management are often made on the card itself and/or the envelope. As the source of pulp used in the manufacture of a greeting card is a significant environmental impact (and of consumer concern) it is valid to make an environmental claim on this issue. However, it is important to ensure that the claim is meaningful and can be substantiated. This section covers:

1. **How to make a valid claim about forest management**
2. **Claims to avoid**

2.1 How do I make a valid claim?

Claims relating to sustainable forest management should:

- Make it clear whether the claim refers to the card or the envelope;
- Refer to a specific forest certification scheme – eg, FSC, PEFC;
- Comply with the rules set by the particular certification scheme regarding use of the logo, the wording of the claim and the ‘chain of custody’ requirements. This may require contacting the certification scheme and obtaining authorisation for use of trademarked logos such as FSC;
- State the percentage (%) content from this source (if the scheme allows).

Example – Sustainable Forest Management

‘Paper made from 75% FSC-certified pulp.’

What is a forest certification scheme?

Third party forest certification schemes are essentially a communication tool that enable forest owners and forest product companies to provide assurance to traders and consumers that the products they are purchasing have been grown in well-managed forests. The schemes set detailed criteria for the source forest, covering issues such as biodiversity, consultation with local stakeholders, legal rights to log the forest, and the rights of forest-dependent peoples. They also set ‘chain of custody’ (CoC) requirements, which involve an audit process to track the raw material from the source forest to the final product.

Existing schemes include international initiatives, such as the Forest Stewardship Council (FSC) and the Pan-European Forest Certification Council (PEFC); and national schemes, such as the Canadian Standards Association Sustainable Forest Management System, the Finnish Forest Certification Scheme, and the American Forest and Paper Association’s Sustainable Forestry Initiative (SFI).

2. Self-declared environmental claims: Forest management

Further information is available at:

FSC – www.fsc-uk.info

PEFC – www.pefc.org

2.2 Claims to avoid

The following claims and terms should be avoided:

1. **Sustainably managed forests**
2. **Carefully managed forests**
3. **Renewable**
4. **One tree planted for every tree cut down**
5. **Made from softwood pulp**
6. **Contains no tropical hardwood**

Sustainably managed forests

Sustainable forest management is a complex issue – there is currently no definitive national or international definition of a ‘sustainably managed forest’. It is therefore recommended that the use of the term ‘sustainable’ is avoided.

However, several forest certification schemes exist which set a standard of forest management and assess the forest against this standard. For this reason, claims relating to forest management should explicitly refer to a certification scheme as described in section 2.1 on ‘how to make a valid claim’.

Carefully managed forests

This claim should be avoided, because the term ‘carefully managed’ has no common definition in relation to forest management and hence is practically meaningless. Instead, a good claim about forest management should follow the guidance provided in section 2.1.

Renewable

This is a tricky claim, since timber (and hence paper) products can be defined as a renewable resource when compared with alternatives such as oil-based plastics. However, given that:

- a) there is no widely accepted national or international definition of renewable forestry; and
- b) the majority of greeting cards are made from paper made from wood pulp;

a claim using the term ‘renewable’ should be avoided, being potentially unclear and implying that the product is exceptional.

2. Self-declared environmental claims: Forest management

One tree planted for every tree cut down

This claim (and similar versions such as 'for every tree cut down, at least one more is planted') should not be used. This is because the vast majority of paper and card used in greeting cards and envelopes will come from forests that are replanted on a commercial basis. To make such a claim therefore falsely implies that the paper or card used is exceptional and carries significant environmental benefits.

'Made from softwood pulp' or 'Contains no tropical hardwood'

The vast majority of paper and card used in greeting cards will be made from softwood pulp. Only a small proportion of paper is made from pulp sourced from tropical hardwoods. Therefore, to make a claim about softwood pulp or tropical hardwood is misleading: an average consumer might be misled into thinking that the use of tropical hardwoods is otherwise common in greeting card manufacture. Both claims should therefore be avoided unless there is a specific consumer concern.

If there is sufficient consumer concern to warrant a claim in certain markets, the claim should state 'made from softwood pulp in common with similar paper products'.

3. Self-declared environmental claims: General

3.1 This section provides further advice on how to make good environmental claims in the greeting card sector. It covers the following claims:

- **Environmentally friendly**
- **Recyclable**
- **Recycled content**
- **Non-chlorine bleached**
- **Environmental Management Systems eg ISO 14001, EMAS**

Requirements for verifying and substantiating all claims are outlined in section 3.2.

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

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 not be made. So claims such as '*environmentally friendly*' should be avoided.

'Recyclable'

Most consumers will be aware that a product made of paper or card is recyclable. Therefore, when making a claim to this effect it is preferable to use a statement which encourages a consumer actually to recycle the card or envelope – rather than simply stating 'recyclable' or 'this card is made from recyclable materials'.

See also the advice on the Mobius loop in section 4.

If the term 'recyclable' is used on cards or envelopes made from materials other than paper or card, the following requirements should be considered:

The term 'recyclable' should only be used when there is evidence that:

- the collection, sorting and delivery systems to transfer the materials from the source to the recycling facility are conveniently available to a reasonable proportion of the purchasers, potential purchasers and users of the product;
- the recycling facilities are available to accommodate the collected materials;
- the product for which the claim is made is being collected and recycled.

3. Self-declared environmental claims: General

'Recycled content'

The use of 'recycled content' claims is widespread and often appears on greeting cards or envelopes. Such a claim should:

1. clearly refer to either the card, envelope or packaging;
2. clearly state the percentage (%) recycled content;
3. clarify what constitutes 'recycled' material;
4. if a symbol or logo is required, use the Möbius loop accompanied by a percentage value or the NAPM mark.

Example

An envelope is made from 65% recycled post-consumer waste. Appropriate claims would be:

- a) "This envelope is made from 65% recycled post-consumer waste"
- b) "Printed on recycled paper containing 65% post consumer waste"
- c)



65% recycled content

Claims which do not provide any quantification (such as "this envelope is made from recycled material") should be avoided.

'Non-Chlorine Bleached'

The two main types of bleaching methods in use are so-called 'ECF' (Elemental Chlorine Free) and 'TCF' (Totally Chlorine Free) bleaching, which are explained further below. Although consumers are unlikely to understand the difference between these two processes, the terms are well established terms within the industry and hence any claim such as 'non-chlorine bleached' or 'card from chlorine free pulp' would benefit from a spelled-out reference to ECF or TCF.

Example – Non-Chlorine Bleached

Card made from 100% Totally Chlorine Free pulp

If at some future date the majority of cards or envelopes on the market were to be made from chlorine free pulp, the use of the claim would be redundant or would need to be clarified by the addition of 'in line with similar paper products'.

3. Self-declared environmental claims: General

Q: What is the difference between TCF and ECF?

A: The two main types of bleaching methods in use are so-called ECF (Elemental Chlorine Free, i.e. when no molecular or gaseous chlorine is dosed in the bleaching) and TCF (Totally Chlorine Free) bleaching. ECF bleaching uses chlorine dioxide, alkali for the extraction of dissolved lignin, peroxide and oxygen for the reinforcement of the extraction stages. TCF bleaching uses oxygen, ozone or peracetic acid and peroxide with alkali for lignin extraction. Chlorine and hypochlorite have largely been phased out as primary bleaching chemicals over recent years.

Q: What is Process Chlorine Free?

A: Process Chlorine Free or 'PCF' is a term reserved for recycled content papers and indicates that the recycled paper is unbleached or bleached without the use of additional chlorine or chlorine derivatives. Since it is often impossible (especially for post-consumer waste) to trace whether the original source fibres were bleached using chlorine or chlorine derivatives, TCF cannot generally be guaranteed for recycled fibres – hence PCF has been introduced.

Environmental Management Systems

Certified Environmental Management Systems (EMSs), notably ISO 14001 and the Eco-Management and Audit Scheme (EMAS), are increasingly being adopted by western pulp mills and paper producers. Because these systems focus on processes and not product performance, claims relating to environmental management systems should not be made on products. However, there is a variety of other ways in which the EMAS logo can be used in association with validated environmental information to help organisations promote their green credentials. For more information, please refer to the guidance note on 'Marketing and promoting your environmental achievements with EMAS', which is available on the EMAS Competent Body web site at: www.emas.org.uk

3.2 Requirements for substantiating a claim

It is not acceptable to have an apparently meaningful and responsibly worded claim if it is not possible to substantiate it. Claims should be capable of being substantiated and verified. To summarise the requirements of ISO 14021:

- All claims made should be verifiable. This means that the claimant should be able to provide documented evidence to substantiate the claim, referring to a particular test method where relevant;
- This documentation should be kept at least as long as the product is on the market, taking into account expected shelf-life;
- Comparative claims should be based on accurate calculations. Where comparative claims make reference to a previous version of the product, it would be necessary to keep adequate information on the content of the previous version in order to demonstrate that the stated reduction/improvement has occurred.

4. Existing declarations and logos

This section covers the following symbols and schemes:

- **EU Eco-label**
- **Paper Profile**
- **Mobius loop**
- **NAPM mark**

EU Eco-label



What is it?

An EU-wide eco-labelling scheme established by the European Commission and managed by Defra (in the UK). It is intended to enable consumers to identify the top 10-15% performing products in the marketplace in terms of overall environmental performance. To qualify for the logo, products must pass set criteria.

Which products does it cover?

At present there are 21 product groups which include copying and graphic paper.

Who is it aimed at?

1. Consumers
2. Public procurers
3. Commercial procurers

At present the EU Eco-label has a limited presence on the UK market.

How can I use it on my product?

If you are a manufacturer, importer, service provider, trader or retailer (of own brand products) you can apply to use the label for products which meet the ecolabel criteria for copying and graphic paper.

Further information on applications in the UK can be found at:

<http://www.defra.gov.uk/environment/consumerprod/ecolabel/index.htm>

4. Existing declarations and logos

Where can I find out more?

General information about the EU Eco-label for copying and graphic paper can be found at:

http://europa.eu.int/comm/environment/ecolabel/producers/pg_copyingpaper.htm#gendescr

Paper Profile



What is it?

Paper profile is a voluntary environmental product declaration, ie. it provides standardised categories for companies to provide environmental information across the product's lifecycle, thereby enabling customers to compare the information across different products. The categories cover EMSs, raw materials, emissions to water and air, solid waste, electricity consumption and product composition. Independent verification of the data is optional, but is highly recommended on an annual basis. Where verification is undertaken, details of the verifying body should be included in the declaration.

Which products does it cover?

All paper products.

Who is it aimed at?

Due to the level of detail in the profile it is suited mainly to business procurers (commercial or public sector). However, by providing a copy of the relevant paper profile on its internet site, a company can help to substantiate a self-declared environmental claim on its product.

How can I use it on my product?

The Paper Profile declaration is made by the paper producer. A list of companies which make paper carrying a Paper Profile declaration is available at

<http://www.paperprofile.com/list.html>

4. Existing declarations and logos

If a card or envelope is made from paper which has a Paper Profile declaration, a short statement may be placed on the product highlighting where the Paper Profile for that particular paper may be accessed:

Example – Paper Profile

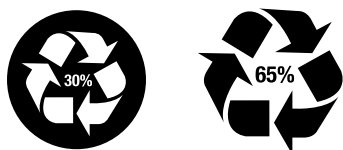
*Environmental information about the paper used in this product can be accessed at:
[insert website address]*

Before making this declaration, a company should make proper checks with the paper producer.

Where can I find out more?

General information about Paper Profile can be found at:
www.paperprofile.com

Mobius Loop



What is it?

The Mobius Loop is an internationally-recognised recycling symbol, in which each arrow represents an aspect of a successful recycling programme: collection; remanufacturing/reprocessing into a new product; and finally purchase by the consumer. The symbol should only be used on goods that are 'recyclable' or include 'recycled content'. In the case of recycled content the percentage should be stated together with the symbol.

Most people will be familiar with the Mobius loop but may be unaware exactly what it means:



Where the symbol appears without a number it indicates that the product is 'recyclable'.



Where the symbol appears with a number it indicates that the product contains x% recycled content – in this case 30% recycled content.

Which products does it cover?

Any which are recyclable or contain recycled material.

4. Existing declarations and logos

Who is it aimed at?

All.

How can I use it on my product?

The Mobius loop is a voluntary logo that may be used free of charge, but the requirements outlined here govern its use. In addition, the symbol should not be used in a modified form to incorporate a company logo or other branding. The specific requirements governing the use of the Mobius loop are outlined in more detail in ISO standard ISO7000, symbol no.1135.

As UK consumers may be unaware of the precise meaning of the symbol, it is good practice to accompany it with a short statement clarifying whether it is referring to recyclable or recycled content. This statement should be in line with the guidance on 'recyclable' or 'recycled content' claims.

NAPM mark

What is it?

The NAPM (National Association of Paper Merchants) offers certification to all branded papers and boards which comply with its definition of recycled paper. To be accorded the mark, the paper or board must be made from a minimum of 75% genuine waste paper and/or board fibre, no part of which should contain mill-produced waste fibre ('mill broke'). Genuine waste is defined as:

- Converters' waste – paper which has left the mill and has become waste during a converting process such as cutting or slitting to meet a specific commercial order;
- Printers' waste – printed or unprinted waste collected from a printing operation (trimmings, left-overs or rejects);
- Domestic or office waste – collected from homes and offices, printed or unprinted.

Any combination of the above can go towards the 75% genuine waste fibre minimum. Under no circumstances can mill broke contribute to genuine waste.

Which products does it cover?

All branded papers and boards which comply with its definition of recycled paper.

Who is it aimed at?

Any.

How can I use it on my product?

Apply to the NAPM.

4. Existing declarations and logos

Where can I find out more?

<http://www.napm.org.uk/info.htm>

<http://www.napm.org.uk/napmrec1.htm>

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