

Guidance on environmental claims on growing media



Department for Environment, Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website: www.defra.gov.uk

© Crown copyright 2003

Copyright in the typographical arrangement and design rests with the Crown.

This publication (excluding the logo) may be reproduced free of charge in any format or medium provided that it is reproduced accurately and not used in a misleading context. The material must be acknowledged as Crown copyright with the title and source of the publication specified.

Further copies of this publication are available from:

Defra Publications
Admail 6000
London
SW1A 2XX
Tel. 08459 556000

This document is also available on the Defra website.

Published by the Department for Environment, Food and Rural Affairs.
Printed in the UK, November 2003, on recycled paper containing 80% post-consumer waste and 20% Totally Chlorine Free virgin pulp.

Product code PB9051f

Guidance on environmental claims on growing media

Contents

1.	Introduction	3
	– Who should read this guidance?	3
	– What is a self declared environmental claim?	4
	– What type of claim do you want to make about your product?	4
2.	Self declared environmental claims: peat content	5
3.	Self declared environmental claims: general	10
4.	Existing declarations and logos	13

Introduction

Who should read this guidance?

All companies that manufacture or sell growing media products in the UK and who:

- Currently make environmental claims about products eg 'peat reduced';
- Are considering how to market the environmental attributes of their products;
- Are receiving queries from customers about the environmental attributes 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 guidance which has been developed by the Department for Environment, Food and Rural Affairs (Defra) and the Department of Trade and Industry (DTI) in conjunction with the Growing Media Association (GMA) to provide clear, user-friendly advice for companies in the growing media sector who wish to make environmental claims about their products. It focuses particularly on claims relating to peat content such as 'peat free' or 'peat reduced'.

By following this guidance, companies can ensure that self-declared environmental claims are meaningful and in line with best practice as set out in the UK Green Claims Code¹, International Standard ISO 14021 and European Commission Guidelines² on 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 growing media 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

What is a self-declared environmental claim?

Any self-declared statement, symbol or graphic that:

1. refers to an environmental aspect of a product, a 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 growing media sector, examples would include statements about the peat content of a product or recycled material content.

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 LCA-based 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 applicable to the growing media sector is provided in section 4.

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

1. Make a self-declared claim about peat content of the product eg 'peat free', 'peat reduced'
 - Go to Section 2
2. Make a self-declared claim about the environmental properties of the product eg 'environmentally friendly', 'natural', 'renewable'
 - Go to Section 3
3. Consider using an existing labelling scheme eg EU Eco-label
 - 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).

Section 2: Self-declared environmental claims: peat content

2.1 Peat Content Claims

When developing a claim, companies should bear in mind that a good environmental claim is one which is:

- Truthful, accurate and able to be substantiated
- Relevant to the product and its environmental impacts
- Clear about the environmental benefits being claimed
- Explicit about the meaning of any symbol or logo

This section provides further advice on how to make good environmental claims relating to peat content, including:

- **Peat free**
- **X% peat content**
- **Peat reduced**
- **Peat sourced from ...**
- **Renewable**
- **Sustainable**

Requirements for verifying and substantiating these claims are outlined in section 2.2.

'Peat free'

Clearly a claim of 'peat free' should not be made if peat has never been associated with the product category.

This aside, the claim 'peat free' may be used on growing media in a number of formats (a) by itself, (b) as part of the product description, for example 'peat free soil improver' or 'peat free mulch', (c) in text on the back of the product or in product literature. All of these uses are acceptable but it is preferable if the claim 'peat free' is accompanied by a description of the dominant product contents:

Example – 'Peat Free'

"Peat Free – this product contains more than 70% bark."

If it is likely that small residual amounts of peat could be present, the 'peat free' claim should be accompanied on the packaging by the caveat, "This product may contain residual levels (maximum 5% in volume) of secondary peat not deliberately sourced for the product".

Section 2: Self-declared environmental claims: peat content

'X % Peat content'

Declaring the percentage peat content in a product is a clear and meaningful statement for consumers. It is also preferable to disclose any other dominant product contents. Claims can take a number of forms, for example:

Example – Percentage (%) peat content

- '100% peat'
- '75% peat'
- 'this product contains no more than x% peat'
- 'this product contains a minimum of x% peat'
- 'this product contains a maximum of x% peat'

The use of maximum and minimum claims allows for batch variability.

'Peat reduced '

The claim 'peat reduced' used on its own could be misleading because it can be interpreted in different ways. It could imply either that the product contains significantly less peat than previous versions, or than similar products currently on the market. As a result, if peat reduced claims are made they must:

- Be calculated by volume and not by weight (due to differences in weight of peat-alternatives);
- State the basis for the comparison. If comparing against a previous version it should give the date when the higher level of peat was used and the amount or percentage change;
- State the actual percentage peat content or level of reduction.

This information needs to be clearly presented, of reasonable size and in reasonable proximity to the claim 'peat reduced'. This means that at minimum any 'peat reduced' claim on front of pack must be accompanied also on front of pack by actual peat content or level of reduction. This information does not have to be within the same sentence, but it must be clearly visible and clearly linked, for example by use of an asterisk or similar.

Section 2: Self-declared environmental claims: peat content

This would result in the following types of claim:

Example – ‘Peat reduced ...’

- ‘Peat reduced, contains x% less peat than our previous version (date)’
- ‘Peat reduced, contains x% peat compared to y% in (date)’

A product that has changed from having 100% to 80% peat content could claim any of the following:

- ‘Peat reduced, contains 20% less peat than our previous version (date)’
- ‘Peat reduced, contains 80% peat compared to 100% in (date)’

A simpler alternative would be to declare the percentage peat content for the product and communicate corporate peat dilution policies via a link to further information on a website or in-store literature.

Example – ‘Peat reduced ...’

“This product contains 50% peat. All [Company name] products containing peat are subject to our corporate policy which aims to reduce peat content over time. Further information on this policy is available from X.”

Peat sourcing references

Claims referring to the sourcing of peat should be consistent with the following guidelines:

1. References to protected areas should be specific ie they should make reference to recognised national or international designations.

Example – Peat not sourced from protected areas

“Peat not sourced from SSSIs or their national equivalent”

2. References to compliance with government, NGO or industry codes of conduct should be explicit and indicate where the code can be viewed

Example – Codes of Conduct

‘This product conforms to the International Peat Society’s Wise Use of Peat Guidelines. Further information on these Guidelines is available from X’

In comparison, a claim such as ‘Conforms to government standards’ would therefore be unacceptable as it is vague and refers to a legal requirement.

Section 2: Self-declared environmental claims: peat content

- References to corporate policies on peat sourcing or peat dilution should be (a) specific, (b) directly applicable to the product contents and (c) indicate where the full policy can be viewed

Example – Corporate Policies

'Peat in this product is sourced according to [company name] policy on peat protection. Copies of this policy and further information is available from X'

(a) What is meant by 'specific'?

The following claim is vague and non-specific and would therefore NOT be considered acceptable:

'Peat produced as part of an environmental policy which reconciles the need for horticultural peat with the need to conserve peatlands...'

(b) What is meant by 'directly applicable to the product contents'?

The critical issue is that by communicating a corporate policy on a product it does not imply something inaccurate about the product the claim is made on.

For example, if a peat-containing product does *not* state percentage (%) peat content or level of peat reduction but *does* have information about a corporate peat dilution policy it implies to the consumer that the product itself has been significantly diluted (which may or may not be the case). To clear up any confusion the solution would be to state percentage (%) peat content/level of reduction for the particular product being purchased AND information on the corporate peat dilution policy, for example:

"This product contains 50% peat. All [Company name] products containing peat are subject to our corporate policy which aims to reduce peat content over time. Further information on this policy is available from X."

Similarly, for peat sourcing, it is clearer to state where the peat used in the product did (or did not) come from rather than just refer to the fact that the producer has a corporate policy on peat sourcing.

'Renewable'

This is a difficult issue with regard to peat, as some might consider that peat can be managed as a renewable resource. However, given that there is no widely accepted national/international definition of a 'renewable peatland resource' this term should not be used in any claims about peat growing media.

Section 2: Self-declared environmental claims: peat content

'Sustainable'

There is no currently accepted national or international definition or method of proving whether a peat source is sustainably managed. As a result, claims should not use the term 'sustainable' or 'sustainably managed'.

2.2 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 must be capable of being substantiated and verified. To summarise the requirements of ISO 14021 this means that companies making any of the claims listed above regarding peat content should ensure that:

- All claims are substantiated before use to ensure that they are fair and truthful;
- 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. For example, it will be necessary for producers to be able to provide evidence to demonstrate that a content claim is not in excess of the stated percentage;
- This documentation should be kept at least as long as the product is on the market, taking into account expected shelf-life;
- Comparative claims, e.g. 'peat reduced, contains XX% less peat than previous version (*date*)', should be based on accurate calculations based on volume and not weight. Given that this example makes 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 a reduction has indeed occurred.

3.1 General Environmental Claims

When developing a claim, companies should bear in mind that a good environmental claim is one which is:

- Truthful, accurate and able to be substantiated
- Relevant to the product and its environmental impacts
- Clear about the environmental benefits being claimed
- Explicit about the meaning of any symbol or logo

This section provides further advice on how to make good environmental claims covering general environmental attributes. It covers the following claims:

- **Recycled** eg 'recycled material', 'recycled growing media'
- **Environmentally friendly**
- **Harmless**
- **Natural**
- **Renewable**
- **Sustainable**

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 www.defra.gov.uk/environment/consumerprod/index.htm

'Recycled'

Claims referring to recycled material content should:

1. Relate to material that would otherwise have ended up as waste;
2. State the percentage of the product that is recycled material;
3. Avoid any confusion over whether it is the product or the packaging that is recycled via explicitly referring to 'the product' or 'growing media' as per the examples below.

Example – 'Recycled...'

- '80% recycled growing media'
- 'This product is made from 80% recycled material from post-consumer waste'
- 'This product is made from 100% recycled mushroom compost'
- 'Contains 80% recycled growing media'

Section 3: Self-declared environmental claims: general

How do you define what is recycled material?

Recycled material can be described as 'material that would otherwise have ended up as waste'.

This means that the term 'recycled material' should not be used to refer to material that would typically be re-used during a manufacturing process eg off-cuts that can be reintegrated into the process as a raw material.

Detailed definitions of recycled material, post-consumer material and pre-consumer material are provided in the ISO standard 14021.

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.

'Harmless'

This claim should not be made as it may be interpreted as implying that the product has no environmental impacts.

'Natural'

The use of this claim is considered vague and unspecific and therefore misleading to the consumer. Its use may be considered acceptable where it is accompanied by an appropriate qualifying statement, e.g. 'peat is a product naturally formed by...'.

'Renewable'

This is a difficult issue with regard to peat, as some might consider that peat can be managed as a renewable resource. However, given that there is no widely accepted national/international definition of a 'renewable peatland resource' this term should not be used in any claims about peat growing media.

'Sustainable'

There is no currently accepted national or international definition or method of proving whether a peat source is sustainably managed. As a result, claims using the term 'sustainable' should not be used.

The same issue applies to other possible constituents of growing media products, such as timber or bark, so again the use of 'sustainable' should not be used. For timber products certification schemes exist such as the Forest Stewardship Council (FSC) and the Pan-European Forest Certification Council (PEFC) and these can of course be referred to for certified constituents/ingredients in line with the terms and conditions set by such schemes.

Section 3: Self-declared environmental claims: general

3.2 Requirements for substantiating a general environmental claim

As with the specific requirements about peat claims discussed above, a claim cannot be considered meaningful and responsibly worded if it is not possible to substantiate it. All claims must be substantiated and verifiable. In this respect companies making any environmental claim should ensure that it is in line with the requirements of ISO 14021 as outlined in section 2.2.

Section 4: Existing declarations and logos

The use of a reputable labelling or product declaration scheme can be a good way of conveying to consumers compliance with often quite complex environmental criteria in a clear way. There are a number of available schemes that range from covering aspects of a product's overall environmental criteria (for example the European ecolabel⁴, which is specifically available for growing media products) to others that address single issues such as organic production or sustainable forestry (for example FSC). In considering the potential for using such a scheme you might wish to consider who your customers are and what issues are important to them.

The Government's *Green Claims – Practical Guidance* on how to make a good environmental claim contain a list of some of the more familiar schemes and more detailed advice on the use of labels. The guidance is available on the Defra website www.defra.gov.uk/environment/consumerprod/index.htm, along with information about the EU ecolabel and its application to growing media products.

Contacts:

Department for Environment Food and Rural Affairs
Nobel House
17 Smith Square
London SW1P 3JR
Telephone 020 7238 6000
Website www.defra.gov.uk

The Growing Media Association
PO Box 15
Stowmarket
IP14 3RD
Telephone 01449 614614
e-mail growingmedia@aol.com
Website www.growingmedia.co.uk

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

PB9051f

**Nobel House
17 Smith Square
London SW1P 3JR**

**About Defra
www.defra.gov.uk**

