

LICENCE HOLDERS GUIDE 2018



Cert.TM

Using the Environmental Choice New Zealand Label
and Making Environmental Claims

About this Guide

This Guide is intended to show companies that have a licence to use the Environmental Choice New Zealand Label for their products or services how to use the label correctly, by summarising the requirements for use and providing examples of correct use.

It also shows licensees how to avoid “greenwashing” in their advertising by providing guidelines on the current laws and best practice for making environmental claims about your products and services.

USING THE ENVIRONMENTAL CHOICE NEW ZEALAND LABEL

Using The Label

Only companies with a licence issued by The New Zealand Ecolabelling Trust (NZET) may use the Label. In using it, licensees must adhere to a set of formal rules which are set out in the Environmental Choice New Zealand (ECNZ) Application and Licence Conditions and explained in this Guide.

NZET is happy to assist licensees to use the Label properly and recommends licensees seek advice before using it or making claims. NZET will review any proposed use of the Label or claims submitted to it, to confirm the use or claims comply with licence conditions.

Licensees will be required to amend or stop any use of the Label or claim that NZET deems unacceptable, misleading or that may adversely affect the Trust or ECNZ's reputation.

LICENCE CONDITION REQUIREMENTS

Licensees and their agents must only use the Label on products or services that meet the requirements of the relevant ECNZ specification (and that are included on their current Licence schedule) or in information about those products or services.

In using the Label:

- » Licensees must always include the product category wording required in the relevant specification and the licence number with the Label; no other wording can be used with the Label - the relevant product category wording is set out in Section 7 "Requirements and Notes for Environmental Choice Licence-holders" of each specification.
- » Licensees must maintain a clear zone around the Label and required wording, as shown in the keyline art to ensure that the Label is not associated with any other environmental or other claim, logo or name; this area must be free of any graphics or text.



- » Licensees must not use the Label in any way that could be taken as referring to anything other than licensed products or services, or use it in any way that could be taken to imply that ECNZ or NZET endorse your products or services in any other way.
- » Licensees must meet the requirements of the keyline art for reproducing the Label: if they are using two colours for the Label, these must be the colours shown on the keyline art; if they are using a single colour, NZET prefers black.

Licensees can also:

- » apply the Label directly to licensed products by moulding, engraving, embossing or printing
- » attach the Label to licensed products on an adhesive or tie-on label
- » integrate the Label as a watermark on sheets of licensed paper products
- » place the logo on company vehicles, where there is a reference to the products or services which have the ECNZ licence.

Packaging

Licensees and their agents may apply the Label to packaging for a licensed product or service, but must ensure that the Label is used in a way that does not suggest that the packaging is licensed (unless the packaging is also licensed).

For licensed packing products or containers, the Label can only be applied to the package or container if it is clear that it does not apply to the product inside the container or package (unless the product is also licensed).

If a licensed product is packaged or contained in a licensed package or container, options are to use two separate Labels on the packaging, or use a single Label including both sets of required wording and Licence numbers.

Advertising

The Label can only be used by licensees and their agents in advertising, promotional or other information in relation to licensed products or services. When it is used in relation to a product or service it means that the product or service meets the requirements of the relevant ECNZ specification. The Label can't be used, or claims made about your Licence, ECNZ or NZET, which could be taken to imply that The Trust endorses the company or its products or services in any other way.

PRINTING AND APPLYING THE LABEL

The Label is available in electronic form from NZET in formats for EPS (printing, desktop publishing and Mac computers), JPG (internet), and TIF/BITMAP (printing), along with a copy of the keyline art.

Formatting

The shape or design of the Label may not be altered in any way. The size may be adjusted to suit your printing layout requirements. Some lettering definition may be lost when reduced to less than 20mm.

A clear space of no less than 25% of the label size is to surround the Label. This space is to be kept free of graphic elements including text, except for the specified reference to the product category and licence number.

The **Product Category Reference** is to be set under the label in Times Italic no smaller than 7pt (1.5mm). The **Licence Number** may be set under the Product Category in Times Roman no smaller than 5pt (1mm capital height).

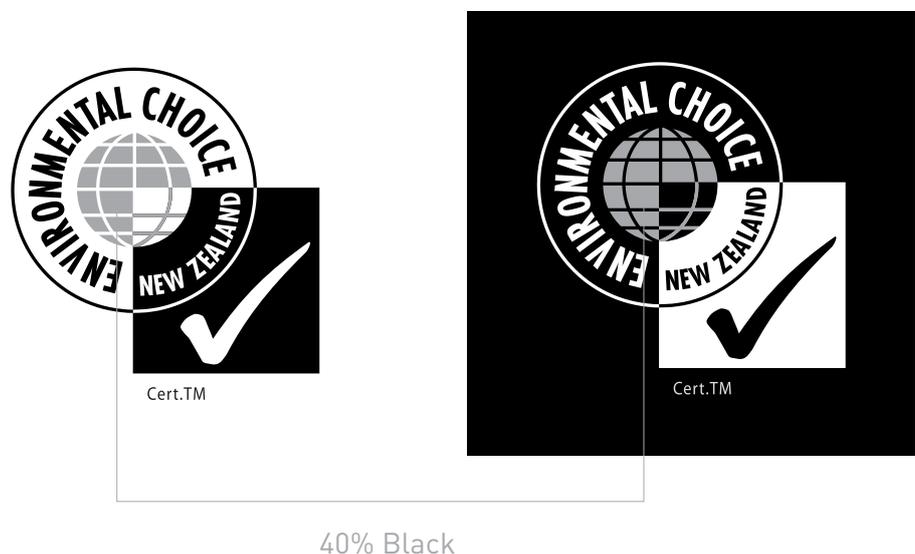
Colours

The Label can be reproduced in mono, two colours and in four-colour processes, as detailed below. Please conform to the specifications, as colour is important in recognising your ECNZ Licence status.

Note: colour reproduction on-screen and from laser printers will not be as exact as that produced by offset printing.

One-colour

The one-colour version can be either black or PMS 347. A tonal breakdown on 40% is to be used as illustrated. Only in circumstances where black or PMS 347 are not being used may another single colour be used. The mono-colour version is appropriate for faxing, laser printing or one-colour printing or advertising.



Two-colour

Use PMS 347 Green and Black as illustrated. The colours are easy to match for printing of all kinds. The two-colour version is the preferred option for printing on stationary and promotional material.

Four-colour

Green: C100 M0 Y100 K0
Black: K100

Examples of Correct Use of Product Category Wording and Licence Number



Paint
Licence No. 1234567



Laundry Detergent
Licence No. 1234567

MAKING ENVIRONMENTAL CLAIMS

Consumers are entitled to rely on any environmental claims made about a product or service and to expect these claims to be truthful and not misleading. It is essential that consumers are provided with accurate information in order to make informed decisions.

Vague environmental claims, claims that mislead by omission or by implication, or claims that are unsubstantiated cause confusion among consumers. They potentially lessen consumer confidence, and cause suspicion about what is really being claimed. They undermine the efforts that genuine manufacturers and suppliers have made to improve the environmental impact of their products and services.

The Law

Using claims that mislead or are unsubstantiated could breach the requirements of the Fair Trading Act. It could also bring advertisers into conflict with the Advertising Standards Authority (ASA). The Act states that those in trade must not mislead or deceive customers in any way, and serious penalties apply for business and individuals that fail to meet these requirements.

A "green" claim can contravene the Act either as misleading or deceptive conduct, or as a false or misleading representation. The Consumer Law Reform Bill (2011) also proposes new requirements about substantiation of claims.

Other Guides

The Commerce Commission has produced two guides to making environmental claims under the Fair Trading Act: Guidelines for Green Marketing and Guidelines for Carbon Claims.

The ASA also has a Code for Environmental Claims, while there is also an International Standard on making environmental claims: ISO 14021 Environmental labels and declarations – Self-declared environmental claims.

Our guide draws on all of these.

GENERAL PRINCIPLES

Claims made by companies in regards to the environmental benefit of their products or services should;

- » only be made for a real benefit relevant to that particular product or service
- » explain the significance of, and not overstate, the benefit
- » be specific, detail the specific part of the product or process it is referring to and not use an unqualified and/or general statement
- » be honest and truthful
- » be accurate and not misleading
- » be substantiated and verified
- » meet local or international standards as appropriate
- » use plain language
- » consider the whole product life cycle.

KEY CONSIDERATIONS AND REQUIREMENTS

Claims should be Relevant and Significant

Any environmental claim made by companies should only be made for a real benefit; they should explain the significance of, and not overstate the benefit relevant to, that particular product. For example, you should not advertise environmental benefits where they are irrelevant, insignificant or simply advertise the observance of existing law. Claims of absence of harmful chemicals or damaging effects are unacceptable if other products within the product category/group do not contain that chemical or have that effect.

The overall impression of the claim counts; the claim should also avoid implications of significant environmental benefits if the benefit is negligible. For example a claim of 50% more recycled content is of no real benefit if the product previously only had 1% recycled content.

Claims should be Specific and Qualified

When making environmental claims, businesses should aim to be as specific as possible, adequately explaining the environmental benefit and the part or parts of the product or production process to which it applies.

Using broad or unqualified claims, such as “green”, “environmentally friendly”, “energy efficient”, “recyclable” and “recycled”, with no further substantiation can risk breaching the Fair Trading Act as they are ambiguous and broadly imply that the product is environmentally beneficial or environmentally benign and they do not explain any specific environmental

benefit. It potentially misleads consumers into thinking that the product causes no harm to the environment in its production, usage and disposal. Few if any products can make this claim as almost all have some adverse effect on the environment in their manufacture, packaging use or disposal.

Providing only partial information to consumers risks misleading them. ISO 14021 requires that all claims be accompanied by an explanatory statement if the claim alone is likely to result in misunderstanding. It also says that claims can only be made without an explanatory statement if the claim is valid in all foreseeable circumstances, with no qualification.

Qualified claims such as “environmentally preferable” may be acceptable where the company can demonstrate a significant environmental advantage over its competitors or a significant improvement on previous formulation, components, packaging, and method of manufacturing or operation.

Claims should be Accurate and able to be Substantiated

Businesses making environmental claims – including statements about sustainability, recycling, carbon neutrality, energy efficiency, use of natural products or impact on animals and the natural environment – should ensure those claims are accurate, scientifically sound and substantiated. Claims must not be made if they can only be verified by confidential business information.

Claims should meet Local and International Standards

Where a particular benefit is claimed for example “organic” or biodegradable then both the claim and the product must meet the local or international standards that are relevant to that claim. ISO 14021 is a key international standard that should be referenced.

Claims should use Plain Language

When making environmental claims business should use language that the average member of the public can understand. Consumers who are unfamiliar with technical terms will often make assumptions and may be misled.

Claims should Consider the Whole Product Life-cycle

Companies should take into account the relevant aspects of the product life-cycle in order to identify the potential for one impact to be increased in the process of decreasing another.

The manufacturing, use, recycling, treatment and disposal process should be taken into account before making any environmental claims regarding the relevant characteristic or part. If the environmental benefit that you are claiming is only relevant to one part of the life-cycle you should specify the

part of the life-cycle to which the claim relates, to ensure consumers are not misled.

Comparative Claims

Comparative claims must be based on an organisation's own prior process or product or another organisation's process or product. Comparisons can only be made using published standards or methods and against comparable products serving similar functions, currently or recently in the same marketplace. Comparative claims involving environmental aspects of a product's life-cycle must be quantified using the same units of measurement, based on the same functional unit and calculated over an appropriate time interval (typically 12 months).

Use of Pictures and Symbols

Images such as those of forests, earth and/or certain endangered animals may suggest and create an impression of environmental benefits or advantages to consumers and should be used with care. Natural objects should only be used if there is a direct and verifiable link between the object and the benefit.

Using a symbol that is widely accepted as having a particular meaning or affiliation when no such link exists can be misleading and these symbols should only be used with qualification and authorisation.

Endorsements

Companies must not represent, by the use of words, symbols or other means, that goods or services have any sponsorship, approval or endorsement that they do not have.

The use of a logo or label from a third-party can only be used with the express permission of and under the guidelines of, that third-party.

Consumers who are unfamiliar with what the environmental scheme certification means for your product may make assumptions and consequently be misled. Offering consumers details of further information on the scheme may help alleviate these concerns.

Tests and Surveys

When using scientific-testing claims companies should be able to provide evidence of the accuracy and relevance of any test results they are relying on. The claim should describe the type of testing done i.e. has it been done by way of scientific, clinical or independent testimony of an authority in that field. They should not be distorted to appear more favourable than they are.

If the scientific basis for the claim is under dispute or not conclusive then companies must not represent the claim as being universally accepted, or give that impression.

Packaging

Claims should be clear as to whether they relate to the product or packaging. For example if a non-recycled or non-recyclable product is packaged with recycled or recyclable materials then this distinction should be clear to consumers.

Greenwashing

In their book, *The Sins of Greenwashing: Home and Family Edition* (2010), environmental marketers and consultants Terrachoice identify what they term the **Seven Sins of Greenwashing**:

1. **The Hidden Trade-Off**, e.g. “recycled paper” – what about the source, energy used, emissions, etc?
2. **No Proof**, e.g. use of words like “green” or “eco”; claims that can’t be substantiated by easily assessable or reliable data.
3. **Vagueness**, e.g. claims of being “environmentally friendly”.
4. **Irrelevance**, e.g. claims like “CFC-free”, which may be accurate but are unimportant or irrelevant for some products.
5. **Fibbing**, i.e. making claims that are false.
6. **The Lesser of Two Evils**, e.g. claims Like “organic cigarettes” or “green pesticides”.
7. **Worshipping False Labels**, e.g. using fake labels to suggest an endorsement.

Commerce Commission Checklist

The Commerce Commission offers the following advice for marketers to help remove any misleading impressions:

- » Avoid using terms like “safe”, “friendly” and “green” and unqualified pictures or graphics. At best they are unhelpful and encourage scepticism, at worst they are misleading.
- » Spell out exactly what is beneficial about a product in plain language that consumers can understand.
- » Link the environmental benefit to a specific part of the product or its production process, such as extraction, transportation, manufacture, use, packaging or disposal.
- » Make sure any claims you make about your product can be substantiated. Think about how you would answer a query regarding the environmental benefits you are claiming about your product. For example, what scientific authority could you use to justify the basis of your claim?
- » Explain how a product’s characteristic is beneficial to the environment. For example, explain that a phosphate-free product is less damaging in river systems because phosphate promotes algal growth, which can clog up rivers.

- » Avoid giving the impression that your product is completely environmentally benign if it is not.
- » Use the claim only in an appropriate context or setting. For example, do not claim that a product is not tested on animals if it is a product that would never be tested on animals anyway.
- » Avoid using technical or industry-related terms where possible and if you do use them, ensure their meaning is clearly explained.
- » If you rely on scientific or other testing to support your claim make sure such testing is accurate. If you include reference to testing in your advertising, explain the relevance of the testing and be prepared to provide test results to any enquirers.

Further Information

The Environmental Choice New Zealand Application and Licence Conditions are available on the Environmental Choice New Zealand website at:

www.enviro-choice.org.nz/documents/Application_and_Licence_Conditions.pdf

Information on the Fair Trading Act and the Commerce Commission's Guidelines for Green Marketing and Guidelines for Carbon Claims is available on the Commission's website at:

www.comcom.govt.nz/environmental-claims

Information on the Advertising Standards Authority Code for Environmental Claims can be found on the Authority's website at:

www.asa.co.nz/codes/codes/code-for-environmental-claims

Copies of ISO 14021:2000 Environmental labels and declarations – Self-declared environmental claims (Type II environmental labelling) can be purchased from Standards New Zealand.

Information on *Terrachoice The Sins of Greenwashing, Home And Family Edition 2010* can be found on the website:

www.sinsofgreenwashing.org

EXAMPLES OF ENVIRONMENTAL CLAIMS

Below are examples of environmental claims or words that are often found in the advertising of products and services. This table is not exhaustive; if in doubt about any claim you want to make, talk with The NZ Ecolabelling Trust or your ECNZ verifier.

Any specific requirement or guidance from ISO 14021, the Commerce Commission or the Advertising Standards Authority (ASA) about the use of the claim or wording has been summarised. ISO 14021 has very detailed requirements about some specific terms and claims. If you are planning to use any of them. The Trust strongly recommends that you read the details in the ISO 14021 standard. Copies of ISO 14021 are available from Standards New Zealand.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
All Renewable Resource Ingredients		The claim must be accurate and able to be substantiated, i.e. every ingredient must be derived from a natural and renewable resource for this claim to be made. All means all! Explanatory information may also be required to explain or define “renewable”.
Biodegradable	ISO 14021 See comments below on Degradable ASA All claims must meet relevant local or international standards as appropriate if a particular benefit is claimed, e.g. biodegradability	Follow the ISO 14021 guidelines for degradable.
Carbon Neutral	Commerce Commission Claims should be factually based, transparent and not overstated. Clearly explain how and what is covered by your claim and what has been offset. Be specific, which elements of the product lifecycle or business activities have been offset When advertising participation in a carbon offset programme, care should be taken to distinguish between past activities and those that are planned for the future. Provide details of the scheme or direct consumers to sources of further information.	Follow the Commerce Commission’s Guidelines for Carbon Claims .

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Compostable	<p>ISO 14021</p> <p>“A characteristic of a product, packaging, or associated component that allows it to biodegrade, generating a relatively homogeneous and stable humus-like substance.”</p> <p>There are requirements about when the claim cannot be used, for example, if substances are released in concentrations harmful to the environment. There are detailed requirements about:</p> <ul style="list-style-type: none"> » qualifications and information to be provided about composting facilities » home composting situations. 	Follow the ISO 14021 guidelines.
Degradable	<p>ISO 14021</p> <p>“A characteristic of a product or packaging that, with respect to specific conditions, allows it to break down to a specific extent within a given time.” Includes, for example biodegradation and photodegradation.</p> <p>There are requirements about:</p> <ul style="list-style-type: none"> » referencing test methods » ensuring the claim is true for the circumstances in which the product would be disposed » degradation not releasing substances in concentrations that are harmful to the environment. 	Follow the ISO 14021 guidelines.
Designed for Disassembly	<p>ISO 14021</p> <p>“A characteristic of a product’s design that enables the product to be taken apart at the end of its useful life, in such a way that allows components and parts to be reused, recycled, recovered for energy, or in some other way, diverted from the waste stream.”</p> <p>There are seven very specific requirements to qualify this statement, including information on tooling, method of disassembly, collection and disposal.</p>	Follow the ISO 14021 guidelines.
Energy Efficient	<p>Commerce Commission</p> <p>Energy efficiency claims should be quantified by comparison to existing benchmarks or rating systems, or otherwise be explained in more detail.</p>	Use existing benchmarks or rating schemes, where they are available, as the basis for energy efficiency claims. If there are no existing benchmarks or rating schemes, provide detailed explanatory information.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Environmentally Certified or Given the Environmental Tick or Green Certified	<p>Commerce Commission</p> <p>Companies must not represent, that goods or services have any sponsorship, approval or endorsement that they do not have.</p> <p>ASA</p> <p>Advertisements must not falsely suggest or imply official approval for a product, whether by words, symbols or other means.</p>	<p>These statements should not be used.</p> <p>Accurate reference should be made to the actual certification scheme, for example: "Environmental Choice New Zealand Licenced" or "X has an Environmental Choice New Zealand Licence"</p>
Environmentally Friendly or Eco Friendly	<p>ISO 14021</p> <p>Environmental claims that are vague or non-specific or which broadly imply that a product is environmentally beneficial or benign must not be used, e.g. "environmentally safe", "environmentally friendly", "earth-friendly", "non-polluting", "green", "nature's friend" and "ozone-friendly".</p> <p>Commerce Commission</p> <p>These claims are vague and could potentially mislead consumers into thinking that the product causes no harm to the environment. Almost all products have some adverse impact on the environment.</p> <p>ASA</p> <p>Absolute claims for environmental benefit, either stated or implied are not appropriate, e.g. environmentally friendly, safe or kind.</p>	<p>These claims or statements should not be used.</p>
Environmentally friendlier/ kinder or preferable	<p>Commerce Commission</p> <p>Making comparative claims without explaining what product or service it is being compared to could mislead consumers.</p> <p>ASA</p> <p>Qualified claims such as environmentally friendlier, safer or kinder may be acceptable where the advertised product, service or company can demonstrate a significant environmental advantage over its competitors or a significant improvement on its previous formulation, components, packaging, method of manufacture or operation.</p>	<p>Claims should be specific and qualified, i.e. what makes the product friendlier, kinder or preferable and what is it being compared to? e.g. "environmentally preferable over... because..."</p>

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Environmentally Safe or Safe for the Environment	<p>ISO 14021</p> <p>Environmental claims that are vague or non-specific or which broadly imply that a product is environmentally beneficial or benign must not be used, e.g. “environmentally safe”, “environmentally friendly”, “earth-friendly”, “non-polluting”, “green”, “nature’s friend” and “ozone-friendly”.</p> <p>Commerce Commission</p> <p>These claims are vague and could potentially mislead consumers into thinking that the product causes no harm to the environment. Almost all products have some adverse impact on the environment.</p> <p>ASA</p> <p>Absolute claims for environmental benefit, either stated or implied are not appropriate, e.g. environmentally friendly, safe or kind.</p>	These claims or statements should not be used
Extended Life Product	<p>ISO 14021</p> <p>“A product designed to provide prolonged use, based on either improved durability or an upgradability feature that result in reduced resource use or reduced waste.”</p> <p>There are requirements for:</p> <ul style="list-style-type: none"> » all claims to be qualified » information to be provided and infrastructure to be available for upgradability » information to quantify the improved or extended durability, supported by standards and statistics. 	Follow the ISO 14021 guidelines.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
<p>“Free” or “No”, e.g. Fragrance-free, Solvent-free, CFC-free, VOC-free, No Carcinogens, No Harmful Chemicals, No Toxins</p>	<p>ISO 14021</p> <p>Claims must not be made about the absence of ingredients or features which have never been associated with the product category.</p> <p>Commerce Commission & ASA</p> <p>Claims based on the absence of harmful chemicals or damaging effects are not acceptable when other products in the category do not include the chemicals or cause the effects.</p>	<p>Consumers will understand that “free” means without, or none. No means no (or none). Claims of “free” or “no” should not be used unless this is true, in all circumstances and without qualification. “Fragrance-free”, for example, should not be used if the product contains essential oils.</p> <p>Explanations will normally be needed to explain or define technical terms, such as “solvent”, “VOC”, “carcinogen”; or “toxin”; and to explain non-technical or vague terms, such as “harmful”.</p> <p>Claims such as “Low VOC” are likely to be better as most test standards have acceptable individual VOC limits set and not a requirement to be 100% VOC-free. Explanations and information about the relevant test standards are likely to be required.</p> <p>The ISO 14021, Commerce Commission and ASA guidance reinforces the general principle of relevance.</p>
<p>Green</p>	<p>ISO 14021</p> <p>Environmental claims that are vague or non-specific or which broadly imply that a product is environmentally beneficial or benign must not be used, e.g. “environmentally safe”, “environmentally friendly”, “earth-friendly”, “non-polluting”, “green”, “nature’s friend” and “ozone-friendly”.</p> <p>Commerce Commission</p> <p>This statement is very vague and conveys little information to the consumer. This term invites a wide range of meanings which risks misleading the consumer.</p>	<p>This term should not be used.</p>

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Natural Product or 100% Natural	<p>ISO 14021</p> <p>Environmental claims that are vague or non-specific or which broadly imply that a product is environmentally beneficial or benign must not be used, e.g. “environmentally safe”, “environmentally friendly”, “earth-friendly”, “non-polluting”, “green”, “nature’s friend” and “ozone-friendly”.</p> <p>Commerce Commission</p> <p>These claims are vague and could potentially mislead consumers into thinking that the product causes no harm to the environment. Almost all products have some adverse impact on the environment.</p>	<p>The ISO 14021 and Commerce Commission guidance on vague terms could also be applied to “natural”. A more specific claim or explanation of the use of the term “natural” should be used, for example “100% Naturally Derived Ingredients”.</p> <p>Some natural products and ingredients like formaldehyde are toxic! Avoid giving the impression that your product is completely environmentally benign if it is not.</p>
Pre-consumer Material	<p>ISO 14021</p> <p>“Material diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.”</p>	Follow the ISO 14021 guidelines
Post-consumer Material	<p>ISO 14021</p> <p>“Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.”</p>	Follow the ISO 14021 guidelines
Recovered Energy	<p>ISO 14021</p> <p>“A characteristic of a product that has been made using energy recovered from material or energy that would have been disposed of as waste but instead has been collected through managed processes.”</p> <p>Before a claim can be made, there is a requirement to ensure that all adverse effects on the environment resulting from the activity are managed and controlled.</p> <p>The type and quantity of waste that has been used for recovery must be stated. There are detailed requirements for calculating the energy recovered.</p>	Follow the ISO 14021 guidelines.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
<p>Recyclable</p>	<p>ISO 14021</p> <p>“A characteristic of a product, packaging, or associated component that can be diverted from the waste stream through available processes and programme and can be collected, processed and returned to use in the form of raw materials or products.”</p> <p>There are requirements to qualify any claims if there are limitations on the availability of collection facilities. Generalised qualifiers like “recyclable where facilities exist” are not adequate.</p> <p>There are requirements about using recycling symbols and to provide information to support the claim.</p> <p>Commerce Commission</p> <p>These claims are potentially dangerous if the product is not recyclable or the facilities to recycle it are not readily available in New Zealand. Before making the claims, companies should verify that the product can be collected and recycled across most of New Zealand.</p> <p>Consumers are likely to understand that the product is likely to end up in a recycling facility, so using the term when this is not the case may be misleading.</p>	<p>Follow the ISO 14021 guidelines.</p>
<p>Recycled Content</p>	<p>ISO 14021</p> <p>“Proportion, by mass, of recycled material in a product or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content.”</p> <p>There are requirements to state the percentage of recycled content and about using recycling symbols.</p> <p>There is a caution about making recycled content claims, as a higher percentage of recycled content does not necessarily imply a lower environmental impact.</p> <p>Commerce Commission</p> <p>This is potentially misleading. Consumers may take this to mean that the product has been through a previous life-cycle or that another consumer has recycled it. Claims should therefore specify the amount of pre-consumer and post-consumer waste included in the product.</p>	<p>Follow the ISO 14021 guidelines.</p>

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Recycled (reclaimed) Material	<p>ISO 14021</p> <p>“Material that would have otherwise been disposed of as waste or used for energy recovery, but has instead been collected and recovered (reclaimed) as a material input, in lieu of new primary material, for a recycling or manufacturing process.”</p>	Follow the ISO 14021 guidelines.
Reduced Energy Consumption	<p>ISO 14021</p> <p>“Reduction in the amount of energy associated with the use of the product performing the function for which it was conceived when compared with the energy used by other products performing an equivalent function.”</p> <p>There are requirements for:</p> <ul style="list-style-type: none"> » all claims to be qualified, describing what the basis of the comparison » supporting measurements and statistics. 	Follow the ISO 14021 guidelines.
Reduced Resource Use	<p>ISO 14021</p> <p>“A reduction in the amount of material, energy, or water used to produce or distribute a product or packaging or specified associated component.”</p> <p>There is a requirement for all claims to be expressed as a reduction percentage and with explanatory statements on the basis of the comparison.</p> <p>If an increase in consumption of another resource results then this must be stated.</p>	Follow the ISO 14021 guidelines.
Reduced Waste	<p>ISO 14021</p> <p>“Reduction in the quantity (mass) of material entering the waste stream as a result of a change in the product, process or packaging.”</p> <p>All claims regarding waste reduction must be qualified to explain the basis for the comparison.</p> <p>Must not include the re-utilization of materials such as rework or scrap generated within the process and capable of being reused within the same process.</p>	Follow the ISO 14021 guidelines.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Reduced Water Consumption	<p>ISO 14021</p> <p>“Reduction in the consumption of water associated with the use of a product performing a function for which it was conceived when compared with the amount of water used by other products performing an equivalent function.”</p> <p>All claims should be qualified to explain the basis of the comparison.</p>	Follow the ISO 14021 guidelines.
Refillable	<p>ISO 14021</p> <p>“A characteristic of a product or packaging that can be filled with the same or similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing.”</p> <p>There are requirements to qualify any claims if there are limitations on the ability to refill. Generalised qualifiers like “refillable where facilities exist” are not adequate.</p>	Follow the ISO 14021 guidelines.
Renewable or Green Energy/ Electricity	<p>Commerce Commission</p> <p>Care must be taken when advertising renewable or green energy that any representations about cost, amounts supplied or the associated benefits are truthful and correct; for example, this should include disclosing the percentage of energy which is obtained from renewable sources.</p> <p>Claims should use the term “renewable” rather than “green” (see guidance on “green” above). Explanatory information may also be required to explain or define “renewable”.</p>	Follow the ISO 14021 guidelines.
Reusable	<p>ISO 14021</p> <p>“A characteristic of a product or packaging that has been conceived and designed to accomplish within its life-cycle a certain number of trips, rotations or uses for the same purpose for which it was conceived.”</p> <p>There are requirements to qualify any claims if there are limitations on the ability to reuse. Generalised qualifiers like “reusable where facilities exist” are not adequate.</p>	Follow the ISO 14021 guidelines.

Claim Made	ISO14021, Commerce Commission or ASA Guidance	Good Practice
Sustainable	ISO 14021 “The concepts involved in sustainability are highly complex and still under study. At this time, there are no definitive methods for measuring sustainability or confirming its accomplishment. Therefore, no claim of achieving sustainability shall be made.”	Follow the ISO 14021 guidelines.