Environmental claims in the EU

Inventory and reliability assessment

Final report

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Draft final report

Directorate-General for Environment

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ACRONYMS AND ABBREVIATIONS

OEF	Organisation Environmental Footprint
PEF	Product Environmental Footprint
PEFCR	Product Environmental Footprint Category Rules
UCPD	Unfair Commercial Practices Directive
VOCs	Volatile Organic Compounds

EXECUTIVE SUMMARY

In the growing market for 'green' products and services, the clarity and accuracy of producers' and traders' claims referring to environmentally friendly characteristics of products and services becomes increasingly important. Consumers require accurate and clear information to make informed decisions about their purchases and to develop trust in the claims associated with products and services on the market. EU level guidance on the application of Directive 2005/29/EC on unfair commercial practices (the UCPD) to environmental claims does not provide specific criteria or a methodology to substantiate environmental claims, making the enforcement of the Directive more difficult. Ongoing EU initiatives are exploring options for action to support and require producers to better substantiate environmental claims, which would in turn empower consumers to play a more active role in transitioning to more sustainable consumption patterns.

To support these ambitions, this study sets out to develop and strengthen the evidence base for the size and nature of the problem of misleading environmental claims. The study first presents the **inventory of environmental claims in the EU**, which aims to identify the extent to which environmental claims are present on a wide range of products and services across the EU, looking at product packaging as well as advertisements. It then summarises the results of **an in-depth analysis of 150 selected environmental claims** carried out by legal experts, looking at the extent to which the claims can be considered misleading according to the criteria in the UCPD guidance.

Inventory of environmental claims in the EU

Methodology

Data were collected via online mystery shopping on web shops and an analysis of advertisements from the Nielsen International Ad Intel database. In total, 1,305 products/services and 1,616 advertisements were randomly selected and screened for environmental claims, covering food and non-food markets. The data collection covered 52 specific products and services, ensuring a diverse sample for each market. The geographical coverage spanned 15 EU Member States.

To what extent do products/services apply environmental claims?

Environmental claims can be defined as 'any claim that suggests or otherwise creates the impression that a good or service has a positive or no impact on the environment or is less damaging to the environment than competing goods or services, due to its composition, mode of manufacturing/producing, how it can be disposed of and/or the energy or pollution reduction expected from its use', set out by the UCPD. Claims can be made in form of a visual claim (image or colour), a logo/label or text. Visual claims are understood as implicit claims, because they suggest eco-friendliness but do not directly state it. A logo/label or text, however, explicitly makes a claim.

80% of web shop pages and advertisements of products/services contained at least one implicit or explicit **environmental claim**. While there was only a small difference between food and non-food products (84% and 77% of all assessments, respectively), the analysis found some noteworthy variations between different markets.

Explicit claims

Explicit claims were found on **35%** of assessed products/services. On average, these products/services contained two explicit claims[1]. 16% of web shop pages and advertisements had an explicit claim in form of a logo or label, compared to 30% containing an explicit textual claim[2]. Logos/labels were more prevalent on food than non-food products (20% and 11% of all assessments, respectively), while there was almost no difference in textual claims between both categories. The most common textual claim for non-food products/services was 'energy efficiency' (1% of all assessments). 'Organic' was the word most frequently used in relation to food products (5% of all assessments).

Some of these explicit claims constitute environmental information that is required by law for certain types of products to be marketed. Other claims are linked to voluntary labelling schemes that grant traders the right to carry official labels or symbols on their products provided they meet certain requirements. Relevant EU legislation, national schemes and other requirements and classified were pre-identified and assigned to three categories, with an additional fourth category for claims that were not pre-identified: (1) mandatory schemes or requirements (environmental information required by law); (2) voluntary ecolabelling schemes established by the EU (EU Ecolabel and EU organic logo); (3) voluntary ecolabelling schemes established by national or regional public entities; (4) other explicit claims.

Mandatory schemes containing environmental information required by law were found on **7%** of web shop pages and advertisements. This was split just about equally across logo/label and text claims (4% of all assessments). The EU Energy label was found in 3% of all assessments of non-food products. The Green Dot was on 2% of food products.

3% of web shop pages and advertisements contained **voluntary ecolabelling schemes established by the EU**. Here, the share differed between food and non-food products: 6% of food products contained the EU Ecolabel or EU organic logo, but the schemes were rarely found on non-food products. The EU organic logo was displayed on 6% of food products. The schemes established by the EU were hardly ever included as text on any web shop page and advertisement.

Voluntary ecolabelling schemes established by national or regional public entities were only identified in **1%** of all assessments – predominantly on non-food products (2% of all assessments). The schemes identified within this category were rarely displayed in text form, but mainly as logo/label. The Nordic Ecolabel was included on 2% of web shop pages and advertisements of non-food products.

Other claims - that were not pre-identified - were more often found than mandatory schemes or voluntary ecolabelling schemes established by the EU or national or regional public entities, in **31%** of assessments. The difference between food and non-food markets was only minimal. These uncategorised claims were more often made in text form (27% of all assessments) than as logo/label (10% of all assessments). The uncategorised logos/labels with the highest prevalence were those of the Forest Stewardship Council (FSC) (1% of all assessments of non-food products), AB Agriculture Biologique (1% of all assessments of food products) and Fairtrade (1% of all assessments of food products).

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[1] Products/services with explicit claims had on average 0.62 logos/labels and 1.50 textual claims.
[2] Products/services could contain more than one explicit claim, in either form (logo/label or text).

Implicit claims

Almost half of the items on web shops and advertisements contained an **implicit claim** (45% of all assessments): 29% with environmental images (such as a tree or water) and 38% with a blue or green background or text font[3]. The share of environmental colours is the same for food and non-food products (both 38% of all assessments). Images associated with eco-friendliness were more often found on food products (33% compared to 24% of all assessments on non-food products), as expected, given the origin (of ingredients) of these products.

Claim themes

Explicit claims can be categorised into themes according the benefit they claim to bring to the environment, such as energy efficiency, air or recyclability. **A general (explicit) claim - where the environmental benefit was unclear - was the most common theme recorded (21% of all assessments)**, followed by claims related to ingredients (10% of all assessments). After general claims, the most prevalent themes differed between food and non-food products. On food products, claims related to ingredients and organic were most often found (16% and 15% of all assessments, respectively). Energy or fuel efficiency and claims were most often referred to on non-food products (11% and 7% of all assessments, respectively). 5% of web shop pages and advertisements contained a logo/label making a carbon/climate related claim. Text claims often referred to ingredients or mentioned 'organic' (8% and 7% of all assessments, respectively).

Potentially misleading explicit claims

Mystery shoppers and advertisement analysts also assessed whether claims on products/services could be considered potentially misleading. This provided an indication of how many potentially misleading claims consumers encounter when engaging with different products/services and markets[4]. Four indicators were used to assess the share of potentially misleading environmental claims, based on the main principles of the UCPD: whether the claim is clear, unambiguous, accurate and verifiable in the evaluator's subjective view.

Overall, **23%** of assessed product/service webpages and advertisements contained **at least one potentially misleading claim**. This implies that more than half of assessed products/services webpages and advertisements containing an explicit claim showed a potentially misleading statement. Potentially misleading text was identified more often than logos/labels (21% vs 5% of all assessments). The difference between food and non-food products/services was minimal (25% and 21% of all assessments, respectively). Interestingly, 2% of assessed product/service webpages and advertisements showed a mandatory scheme or requirement that did not fulfil all four UCPD principles, in the subjective view of the evaluator. A higher share of claims that were not associated with either a mandatory requirement nor a voluntary scheme was perceived as potentially misleading (21% of all assessments).

In-depth analysis of environmental claims

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[3] Implicit claims were only recorded if no explicit claim was found.
[4] This is based on the assumption that the sample was representative.

Building on the initial assessment carried out for all identified claims during the data collection exercise, a second phase of the study includes an in-depth analysis of 150 selected environmental claims to better understand their clarity, accuracy and the extent to which they are substantiated with evidence that can be verified.

Several categories of environmental claims were taken into account, including mandatory requirements, legislated voluntary environmental labelling schemes, codes of conduct, legal guarantees for products, and any other additional information provided by producers and traders that were relevant for the study objectives.

According to the UCPD and its guidance, environmental claims should be presented in a clear, specific, unambiguous and accurate manner and they should be substantiated with information that can be verified with evidence available to the public. Each of the selected 150 claims was assessed against these three criteria. If one of the criteria was judged not to be fulfilled, the claim was assessed as misleading.

Main findings

The national legal experts found **53.3% (80 out of 150) of the environmental claims to be potentially misleading**. Regarding the specific features of the claims, 54 claims were identified as unclear and ambiguous, 47 were assessed as inaccurate and 61 as unsubstantiated. The figure below presents the relationship between substantiation, clarity and accuracy in the sample of claims submitted to in-depth analysis.

Figure: Substantiated vs not substantiated claims, by clarity and accuracy
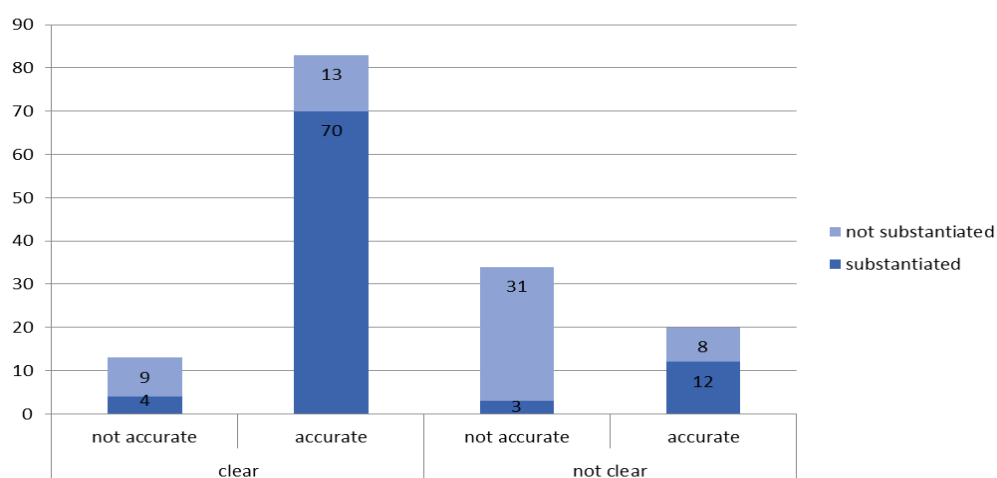
Just over two-thirds (64%) of the environmental claims were assessed as clear and unambiguous. Claims that were considered unclear and ambiguous typically used vague terminology (e.g. words like 'natural', 'sustainable', 'eco', or 'bio') or the claim could not be linked to any specific characteristic of the product.

The majority of claims assessed as unclear were also judged as inaccurate, especially when the claim was formulated in a vague and overly general way. Slogans and statements with positive connotations related to environment and/or sustainability often lack details or specific information about the environmental impacts and lifecycle stages to which the claim refers, which limits their accuracy. Several claims use prefixes such as 'eco' or 'bio', which, in some cases – particularly where products are not certified as coming from organic agriculture - had neither a clear meaning nor were they assessed

as accurate. Another group of environmental claims offered comparisons to undefined benchmarks.

A claim was assessed as substantiated if the producer/trader provided sufficient information to explain the claim on the packaging, the product website or through direct contact. **40% of the investigated claims were considered unsubstantiated.** In most cases, substantiation was partial, and the information provided was considered incomplete or not persuasive. Another important issue is that substantiation of the claim is not always in the language of the country where the product is sold, which undermines the ability of the consumer to understand it.

Further analysis was carried out on a smaller selection of claims (31 in total) to better understand how they link to the **Product Environmental Footprint Category Rules** (PEFCRs). It was found that due to the general nature of many claims, it is not easy to relate them to the information in the PEFCRs without considerable product knowledge, scientific expertise, and study. This is beyond the capacity of the average or even educated consumer. For most product categories, there are many key areas of environmental impact, and the claims are likely to address only one or a limited selection of them. Within the small sample of claims under analysis, two clear cases were identified where the assessment of the legal expert as 'not misleading' could be considered misleading when considering the detailed requirements of the PEFCRs, showing that these approaches have the potential to shed light on claims that would not always be perceived by informed consumers.

Final observations

The study confirms the findings of previous work on this topic[5] that few of the environmental claims can be considered 100% in line with the UCPD.

Many of the assessed as unclear and ambiguous contained vague, general statements which, on first impression, could not be associated with any concrete environmental impact. Several of these claims were eventually assessed as accurate and substantiated – nevertheless, in line with the UCPD guidance, they were categorized as potentially misleading. This points at a **gap in awareness** among traders/producers, where they do not realise that the use of catchy, vague statements may be misleading, despite having a valid, verifiable claim.

Determining whether or not a claim is clear is not always straightforward. In some cases, very similar claims were assessed as clear/unclear by different experts. This could imply the **need for more specific rules on what is considered clear**, especially as this could cause an otherwise acceptable claim to be considered misleading under the UCPD.

Another overall conclusion of the study is that **independent certification schemes greatly improve the clarity of the claims**. However, the increasing proliferation of schemes, logos and labels may confuse consumers. Indeed, some producers have developed their own logos or certificates, which may be particularly problematic, especially where producers do not provide sufficient substantiation. For certification to work, **common standards must be followed** and consumers must know what they can expect from certain logos, labels or certificates. A related aspect is ensuring that

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[5] GfK et al, *Consumer market study on environmental claims for non-food products,* for the European Commission DG Justice and Consumers, July 2014.

consumers are sufficiently informed and educated on recognising and interpreting environmental certificates and labels.

1 INTRODUCTION

With citizens increasingly aware of and concerned about their impact on the environment, the climate and sustainability, the market for 'green' products and services is highly attractive. Claims by traders and producers that products or services have a positive or no impact on the environment or are less damaging than their competitors have become commonplace, as are concerns about the clarity and accuracy of such claims. Recent surveys and consultation efforts confirm this – 49% of respondents to an EU-wide public consultation said they had encountered an unreliable environmental claim, and many reported concerns about the vague use of terms such as 'natural', 'eco', 'green' or 'sustainable' on product packaging[6]. In a recent Eurobarometer survey, 90% of Europeans agreed that there should be stricter rules when calculating environmental impact and related environmental claims[7].

Current EU legislation on commercial practices - the Unfair Commercial Practices Directive (UCPD) does not explicitly address misleading environmental claims. A section of the Commission's guidance on the implementation of the UCPD provides details on the application of the Directive to environmental claims[8]. However, neither the Directive nor the guidance provide specific criteria or a methodology to substantiate environmental claims, making the enforcement of the Directive more difficult[9].

In recent years, the European Commission has made efforts to address the lack of consumer trust in environmental marketing and the challenge of authenticating such claims.

One of these efforts was to provide a common basis for calculating environmental performance. The Commission Recommendation on common methods to measure and communicate life cycle environmental performance was adopted in 2013[10], introducing two methods, the Product Environmental Footprint (PEF) and the Organisation Environmental Footprint (OEF). Rules and performance benchmarks have been developed as part of a pilot project to test the application of the PEF and OEF methods to specific product categories and sectors. The tests included ways of communicating PEF or OEF results to company stakeholders.

An initiative is currently underway to evaluate options for EU action in this area[11], including an option to establish an EU legal framework - voluntary or mandatory – that

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[6] Milieu Consulting, *Support for the upcoming Commission Initiative towards an EU product policy framework supportive of Circular Economy: Draft report on open public consultation,* for the European Commission DG Environment, February 2019.

[7] European Commission, *Attitudes of European citizens towards the Environment*, special Eurobarometer 501, March 2020.

[8] European Commission, *Guidance on the implementation/application of Directive 2005/29/EC on Unfair Commercial Practices*, SWD(2016) 163.

[9] European Parliament, IMCO Committee, *Sustainable Consumption and Consumer Protection Legislation. How can sustainable consumption and longer lifetime of products be promoted through consumer protection legislation?,* 2020.

[10] 2013/179/EU: *Commission Recommendation of 9 April 2013 on the use of common methods to measure and communicate the life cycle environmental performance of products and organisations.*

[11] European Commission, Roadmap for Inception Impact Assessment, *Legislative proposal on substantiating green claims,* July 2020.

would promote the use of these methods as a harmonised approach for providing reliable environmental information.

From a consumer perspective, the European Green Deal[12] and the Circular Economy Action Plan[13] stress the need for standard methodologies to enable consumers to make more sustainable decisions and to protect them from unreliable claims. The ongoing Commission initiative 'Empowering the consumer for the green transition' is considering how this might be enabled by EU consumer protection legislation[14].

To support these initiatives, this study sets out to develop and strengthen **the evidence base** for the size and nature of the problem of misleading environmental claims. It builds on and expands work carried out for the European Commission in 2014[15], looking at a wider selection of product markets and categories in more Member States. To do so, an inventory of environmental claims has been developed for both non-food and food and drinks markets at the level of products (goods and services) in 15 EU Member States. Environmental claims have then been categorised according to several criteria, including type of environmental impact, explicit or implicit nature of the claim, whether it is required by EU legislation, and whether it is part of a legislated scheme. The extent to which the identified environmental claims can be considered misleading according to the UCPD guidance is then assessed from two perspectives: that of the average consumer during collection of data from web shops and advertising databases, and from the perspective of an educated consumer making efforts to research the available information to substantiate claims.

The report is structured as follows:

- **Section 1 Introduction** provides an introduction and brief policy context for the study.

- **Section 2 Inventory of environmental claims in the EU** aims to identify the extent to which environmental claims are present on a wide range of products and services across the EU, looking at product packaging as well as advertisements. It presents the data collection methodology and how environmental claims have been identified and categorised, as well as an extensive review of results covering indicators on the share of explicit and implicit environmental claims on products, environmental claims by theme, and the share of potentially misleading environmental claims.

- **Section 3 In-depth analysis of environmental claims** summarises the results of the in-depth analysis of a sample of 150 environmental claims selected from those identified in the inventory, including overall conclusions and lessons.

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[12] European Commission, *The European Green Deal*, COM(2019) 640.

[13] European Commission, *A new Circular Economy Action Plan for a cleaner and more competitive Europe*, COM(2020) 98.

[14] European Commission, Roadmap for Inception Impact Assessment, *Empowering the consumer for the green transition,* June 2020.

[15] GfK et al., *Consumer market study on environmental claims for non-food products,* for the European Commission DG Justice and Consumers, July 2014.

- **Annexes I - VIII** include information on assessments, briefing documents for data collection, mandatory and voluntary schemes and template.

2 INVENTORY OF ENVIRONMENTAL CLAIMS IN THE EU

2.1 Introduction

The 2014 consumer market study on environmental claims for non-food products demonstrated that environmental claims are widespread on product packaging and in advertising. This applies to both implicit (colour or image) and explicit (logo/label or text) claims and covers environmental information required by law or to comply with voluntary schemes at EU, national or regional level. This section will provide an up-to-date overview of the **prevalence and types of environmental claims** and describe how they have evolved since 2014. Extending the scope of the earlier research, the study presented in this report covers both food and non-food products, as explained below.

The first step in the overview was to design and build an **inventory of environmental claims** that would cover a large range of Member States, types of products and markets. The data for this inventory were obtained through two data collection methods already been used in the 2014 study: **mystery shopping and analysis of advertisements** of 52 products/services in 15 countries. The assessment of the products/services and advertisements was guided by a standardised digital questionnaire that captured predefined characteristics of each claim identified. These questionnaires were finally merged to create the inventory on which the results in this section are based.

For clarity, before presenting indicators of environmental claims and their share, the methodology for creating the inventory is first briefly described.

2.2 Methodology

2.2.1 Selection of products

10 non-food and nine food product markets were covered by the data collection activities. These markets were further split into 52 specific product/service categories.

The 10 non-food markets and corresponding 25 product/service categories were already covered in the 2014 consumer market study on environmental claims for non-food products, which allows for comparisons over time. Initially, these 10 markets were selected for their representativeness of the average European customer's consumption pattern, as well as their higher prevalence or likelihood of containing environmental claims[16].

Of the 27 food product categories, 19 were selected based on their inclusion in the Consumer Footprint Basket of Products Indicator on Food[17]. The Basket of Products was created as a means of gathering insight into the footprint created by the consumption of a set of products that is representative of the average consumption pattern in the EU and was previously identified (in earlier research) as being responsible for large environmental burdens, taking into account the full lifecycle of the products[18]. In order to

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[16] Consumer Market Study on Environmental Claims for Non-food Products, p. 39; DEFRA Assessment of Green Claims on Products – Technical Report, 2010, pp. 5-6,
[17] JRC, Consumer Footprint Basket of Products Indicator on Food, 2017
18 *ibid*., p. 11

come to a list of 27 food products, the products in the Basket of Products were complemented with those used in the consumer study on the functioning of voluntary food labelling schemes[19], and the categories covered by the Product Environmental Footprint Category Rules (PEFCRs)[20]. In some cases, the product categories needed to be redefined to be sufficiently specific and concrete to facilitate unambiguous data collection, reporting and further interpretation.

The table below shows all markets and their product categories included in the study.

Table 1: Markets and product categories included in the study

	Markets	Product categories
Non-food	Consumer electronics	Mobile phones*
		Laptops*
		Televisions**
	Household appliances	Washing machines**
		Refrigerators*
		Coffee machines*
	Textiles	Clothing: sportswear women
		Footwear : men European size 42
	Household cleaning and storing products	Washing machine detergents
		Rubbish bags
	Personal hygiene and beauty products	Shampoos
		Skin creams
		Toilet paper
	Baby products	Baby bottles
		Baby diapers
	Miscellaneous household	Paints
		Windows
		Hardwood floors***
		Carpets
		Showerheads***
	Transport	Passenger vehicles
		Airlines
	Financial services	Consumer investment products
	Other services	Hotels
		Household electricity services
Food	Beverages	Wine
		Lager Pils
		Ground coffee
		Bottled water
		Orange juice
	Cereals and cereal products	Pre-packed bread
		Spaghetti pasta

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[19] IPSOS and London Economics, *Consumer market Study on the functioning of voluntary food labelling schemes for consumers in the European Union* for the European Commission Executive Agency for Health and Consumers, 2013.
[20] Product Environmental Footprint Category Rules (PEFCRs), available at: https://ec.europa.eu/environment/eussd/smgp/PEFCR_OEFSR_en.htm

	Markets	Product categories
		Rice
	Dairy and eggs	Whole milk
		Eggs
	Fats and oils	Margarine
		Olive oil
		Sunflower oil****
	Fruits	Apples
		Bananas
		Oranges****
	Meat	Poultry meat (raw and unprocessed)
		Beef (raw and unprocessed)
	Pre-prepared meals	Lasagne****
		Soup (in Tetrapak)*****
		Pizza
	Sugar	Cane sugar***
		Granulated white sugar***
		Sugar*
	Vegetables	Tomatoes
		Canned beans****
		Potatoes

*Not assessed by mystery shoppers
**Mystery shopping of manufacturers (brands) websites
***Not assessed via advertisement analysis
****Extended to similar products for the advertisement analysis
*****For Ireland replaced by canned soup as Tetrapak soup was unavailable

2.2.2 Selection of Member States

The data collection activities covered **15 countries,** selected to provide a balanced mix with respect to the following four dimensions:

- Geographical representation (covering East, North, South and West Europe);

- Combined large share of total EU population and GDP;

- Mix of early and more recent EU entrants;

- Mix of low and high incidences of environmetal claims on products shown in previous studies.

The variations among these dimensions were essential in order to evaluate the data as representative of the Member States. Table 1 below shows the countries covered in the study and the regional mapping.

Table 2: Member States covered in the study

Region	Country
Eastern Europe	Czechia
	Hungary
	Poland

Region	Country
	Romania
Northern Europe	Denmark
	Finland
	Sweden
Southern Europe	Greece
	Italy
	Portugal
	Spain
Western Europe	France
	Germany
	Ireland
	Netherlands

Airline companies were assessed based on pan-European rather than country or region-specific data.

2.2.3 Identification and categorisation of claims

For the purposes of identifying environmental claims, the following definition was applied, based on the Commission's guidance on the application of the Unfair Commercial Practice Directive (UCPD)[21]: any claim that suggests or otherwise creates the impression that a good or service has a positive or no impact on the environment or is less damaging to the environment than competing goods or services, due to its composition, mode of manufacturing/producing, how it can be disposed of and/or the energy or pollution reduction expected from its use.

To facilitate analysis, environmental claims were then categorised in two main ways:

- **Explicit** (containing text or a logo/label) or **implicit** (a visual claim with just an image or colour);
- Whether the claim is **mandatory** (environmental information required by law) or linked to a voluntary ecolabelling scheme established by the EU or national or regional public entities.

To guide the understanding of the study results, Figure 1 presents the classification of the different types of claims.

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[21] European Commission, Guidance on the implementation/application of Directive 2005/29/EC on Unfair Commercial Practices, SWD(2016) 163.

Figure 1: Classification of environmental claims

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                        ┌─────────────────────────┐
                        │   Environmental claim   │
                        └─────────────────────────┘
                          │                      │
           ┌──────────────────┐         ┌──────────────────┐
           │  Explicit claim  │         │  Implicit claim  │
           └──────────────────┘         └──────────────────┘
             │            │               │              │
    ┌───────────┐  ┌───────────┐  ┌─────────────┐  ┌─────────────┐
    │ Label/logo│  │   Text    │  │   Image     │  │  Colour     │
    │ Examples: │  │ Examples: │  │ …that is    │  │ …that is    │
    │ FSC, EU   │  │ 'Ethical',│  │ associated  │  │ associated  │
    │ Ecolabel, │  │ 'Recycled'│  │ with        │  │ with        │
    │ Mobius    │  │ 'Carbon   │  │ environ-    │  │ environ-    │
    │ Loop,…    │  │ offsetting'│ │ mental      │  │ mental      │
    │           │  │ ,…        │  │ sustain-    │  │ sustain-    │
    │           │  │           │  │ ability     │  │ ability     │
    │           │  │           │  │ (examples:  │  │ (blue or    │
    │           │  │           │  │ trees,      │  │ green text  │
    │           │  │           │  │ mountains,  │  │ or          │
    │           │  │           │  │ water,…)    │  │ background  │
    │           │  │           │  │             │  │ colour)     │
    └───────────┘  └───────────┘  └─────────────┘  └─────────────┘
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| Mandatory schemes or requirements | Voluntary ecolabelling schemes established by the EU | Voluntary ecolabelling schemes established by national or regional public entities | Other claims |

Explicit versus implicit claims

Environmental claims can be broadly categorised as either explicit (text or logo/label) or implicit (visual claim; image or colour). In this study, claims are only categorised as implicit if no explicit claim was identified.

An implicit visual claim creates the impression of environmental benefits (such as a decorative image of trees or blue water). However, producers/designers may not intend to convey an environmental claim or image but, rather, the corporate colour (blue background) or a national symbol (shamrock for Ireland). Here, implicit claims were assessed irrespective of this context and their categorisation as a 'claim' was solely based on the subjective assessment of mystery shoppers and advertisement analysts and not the intention of the producer/designer. Detailed guidelines provided to the assessors, together with a thorough second review of the visuals, ensured an objectively plausible categorisation, however.

As claims can combine textual and visual elements and can be explicit to a varying degree, any text that was clearly part of a logo (for example 'FSC' as part of the FSC or Forest Stewardship Council logo) was considered part of this logo rather than a text claim. If this text was shown separately from a logo, it was coded as a text claim. A text claim was recorded if the primary means of conveying the claim was text and any visual elements were purely supportive (e.g. a circle around the text). This means no unique claim was recorded as both text and logo/label.

Legislative requirements

Some environmental claims constitute environmental information that is required by law for certain types of products to be marketed. Other claims are linked to voluntary labelling schemes that grant traders the right to carry official labels or symbols on their products provided they meet certain requirements. The legal team responsible for the in-depth analysis work (see Section 3.2.2) identified the relevant EU legislation, national schemes and other requirements that impact the nature of environmental claims on many of the products and services included in the study. Explicit environmental claims were then classified into three categories, with an additional fourth category for claims that were not pre-identified: (1) mandatory schemes or requirements; (2) voluntary ecolabelling schemes established by the EU; (3) voluntary ecolabelling schemes established by national or regional public entities; (4) other claims. These are described in detail below.

1. **Mandatory schemes or requirements** are 'mandatory environment-related information' in the form of a label or text. In such cases, this information is included on products or advertisements in order to comply with legislation and regulations, rather than to create any impression of environmental benefit for marketing purposes. In some cases, however, this information is also used as a marketing claim, as illustrated in the examples below. For the products included in this study, mandatory environmental information is required under the following EU legislation:

   - The **EU Energy Label**, as defined by Directive 2010/30/EU *on the indication by labelling and standard product information of the consumption of energy and other resources by energy-related products*. 'The EU energy labels provide a clear and simple indication of the energy efficiency of products at the point of purchase'[22]. This study included products such as televisions, refrigerators and washing machines. While energy labels themselves are mandatory and not considered environmental claims for marketing purposes, they may be part of a claim that a particular product is more energy efficient than others.

   - Information on **fuel efficiency and CO_2 emissions of passenger vehicles**, based on Directive 1999/94/EC *relating to the availability of consumer information on fuel economy and CO_2 emissions in respect of the marketing of new passenger cars*. Again, in some cases, the provision of information is linked to a claim that the cars have better emissions standards than others in the same market.

   - As stipulated by Directive 94/11/EC, *relating to labelling of the materials used in the main components of footwear for sale to the consumer*. Thus, the **materials used in footwear** European men size 42, for example, must be disclosed[23]. In some cases, the information on labels is linked to broader environmental claims, such as being 'natural' or using recycled materials.

   - Details must be provided on clothing, such as the **textile composition of women's sportswear,** as set out by the Textile Regulation (EU) No 1007/2011 *on fibre names and related labelling and marking of the fibre composition of*

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[22] Information on the energy label and ecodesign is available at: https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/about_en

[23] Evaluators were not directly instructed to assess whether or not the materials used were indicated, therefore there might be an underestimation of this claim.

textile products[24]. In some cases, the information on labels is linked to broader environmental claims, such as being 'natural' or using recycled materials.

- **Recommended dosages for washing machine detergents,** as specified by Regulation (EC) No 648/2004 *on detergents*. Labels on detergents sold for public use must give details of recommended dosages for different washes in a standard washing machine[25]. While this is not in itself an environmental claim, it has an environmental purpose (i.e. to reduce phosphate discharges to water).

- As specified by Regulation (EU) No 1169/2011 *on the provision of food information to consumers*, information on the **country of origin must be provided for a range of food products** covered in this study[26]. This refers exclusively to country claims, rather than regions or text such as 'homeland', 'domestic' or 'local'. In some cases, information about the country of origin may be interpreted by consumers as an environmental claim, as it may imply lower transport impacts from a shorter supply chain.

- **Green Dot** is used by traders of a product to indicate that a certified national packaging recovery organisation received a financial contribution for recovery of the product packaging[27]. It is not mandatory *per se* but is widely used in many Member States under extended producer responsibility (EPR) schemes for packaging waste, in line with the European Packaging and Packaging Waste Directive 94/62/EC. It is thus considered 'quasi-mandatory'. As it was among the mandatory claims in the 2014 consumer market study on environmental claims for non-food products, it also falls within this category in the current study. The Green Dot can be found on both food and non-food products.

2. **Voluntary ecolabelling schemes established by the EU** are voluntary ecolabel schemes managed by public administrations and applicable in all Member States. As they are voluntary, the required provisions apply only if the producer or trader chooses to market a product or service according to the scheme. The following were considered under this category:

- **EU Ecolabel** 'is a label of environmental excellence that is awarded to products and services meeting high environmental standards throughout their lifecycle: from raw material extraction, to production, distribution and disposal'[28].

- The **EU organic logo** on food products 'guarantees that EU rules on organic production have been respected. […] In the case of processed food, it means that at least 95% of the ingredients of agricultural origin are organic. Supermarkets

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[24] Evaluators were not directly instructed to assess whether or not the textile composition was indicated, therefore there might be an underestimation of this claim.

[25] Evaluators were not directly instructed to assess whether or not the recommended dosage was indicated, therefore there might be an underestimation of this claim.

[26] Eggs, olive oil, apples, bananas, oranges, poultry (raw and unprocessed), beef (raw and unprocessed), tomatoes, canned beans, potatoes.

[27] The Green Dot Trademark, available at: https://www.pro-e.org/the-green-dot-trademark

[28] See: https://ec.europa.eu/environment/ecolabel/

and other retailers can label their products with the term organic only if they comply with the rules'[29].

3. **Voluntary ecolabelling schemes established by national or regional public entities** are voluntary schemes at national or regional level in the form of text or a logo/label. The following schemes are covered in the data collection[30]:

- Blue Angel in Germany;

- *Ekologicky šetrný výrobek* (environmentally friendly product) in Czechia;

- *Ekologicky šetrná služba* (environmentally friendly service) in Czechia;

- Nordic Ecolabel/Nordic Swan in Denmark, Sweden and Finland.

Nordic Swan and the Blue angel did appear also in other countries beyond the above listed countries. In such case (e.g. Nordic Swan appearing on a French product) this was still reported as voluntary scheme 'established by national or regional public entities'.

4. **Other claims** are all textual claims or logos/labels that were not categorised as belonging to any of the three categories of mandatory claims or voluntary schemes.

To account for the fact that the mystery shopper might not be familiar with an environmental logo/label/scheme or textual claim, a detailed briefing with examples of images (see Annex VII) was given to each and they were instructed to take a screenshot of the image. These screenshots allowed a later quality control check of the assessments conducted. It should be noted that the assessment was done from a consumer rather than a legal perspective (which is performed as part of the in-depth analysis covered in Section 3).

Finally, in order to identify any **potentially misleading claims**, the claims were examined to see if they were clear, specific, accurate and unambiguous, and verifiable by evidence (see Section 2.3.5 for more details).

2.2.4 Data collection

For each product/service webpage, packaging and advertisement, the presence of explicit and implicit environmental claims was assessed via mystery shopping and an assessment of advertisements. Claims were gathered on products/services and advertisements for 27 food and 25 non-food categories. These 52 categories were distributed across countries such that each product category was covered in at least four countries and each market

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[29] The EU's organic food market: facts and rules, available at:
https://www.europarl.europa.eu/news/en/headlines/society/20180404STO00909/the-eu-s-organic-food-market-facts-and-rules-infographic

[30] An overview of the specific countries and products to which each scheme applies is provided in Annex IV. No legislated environmental label was identified in Ireland, Romania, the full territory of Spain, Portugal and Greece. Milieukeur or PlanetProof (NL); Polish Eco Mark; Hungarian Ecolabel; Made green in Italy and Catalan Environmental Quality Guarantee were never listed by the mystery shoppers or advertising analysts and thus can be concluded to have a share of 0% among the products/services assessed.

was represented in all countries. This distribution was applied to both the mystery shopping and the advertisement analysis[31].

Mystery shoppers visited web shops on the websites of retailers/service providers offering at least one of the selected products. These websites were pre-selected based on their high likelihood to offer the product/service categories, while ensuring the coverage of a variation of different shops (e.g. in terms of size). For each product category, a minimum of four individual product items were assessed, following a random selection from all product items available. If exactly four or fewer than four items were available, all were included. If more products were available, an interval was calculated (the total number of products divided by the number of products to be assessed) to guide the random (and thus representative) selection. For each product category, one country from each of the four regions was selected (exceptions are listed below). Mystery shoppers examined the product-related information available on the product page, in the web shop and on the product picture to determine whether or not it included any environmental claim and if this claim was potentially misleading to them as consumers. In order to ensure representativeness of the product items in terms of market share, mystery shoppers also examined different packaging sizes of the same product.

There were several exceptions to the approach described above:

- For certain categories (airlines, consumer investment products, hotels and household electricity services), a **homepage approach[32]** was used, whereby one website was assessed in each country. This approach better fit these types of products/services.

- Due to the **COVID-19 pandemic** and its consequences in terms of movement restrictions, the mystery shopping exercise was carried out **online** rather than in a physical store. This decision had an impact on the product selection for mystery shopping within the consumer electronics and household appliances markets. As product information is mostly provided on the packaging of certain products – which is rarely displayed online – mobile phones, laptops, refrigerators and coffee machines were not included in the mystery shopping exercise but only in the assessment of advertisements. The homepage approach was applied for televisions and washing machines, with four homepages of brands/manufacturers assessed per region for each product[33].

- To increase the number of online assessments, **a second country per region** was selected for the assessments of clothing, washing machine detergents and paints (see Annex I for the total number of assessments performed by mystery shoppers per country).

In total, 1,305 products were evaluated by mystery shoppers, covering all 15 countries.

Professional **advertisement analysts** examined 1,616 randomly selected **advertisements** for environmental claims on the selected products. All 15 countries

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[31] Only in cases where, for example, no advertisements were available for a certain country x product category selected in the mystery shopping exercise, was the country replaced by another in the same region.
[32] A homepage approach means that mystery shoppers had to go to one web page (homepage or product page) and check for environmental claims on this page, rather than browsing a webstore with several products.
[33] The homepage approach requires more time than browsing one webstore with several products, meaning that fewer assessments were made.

were covered. For each product/service category, four advertisements (a mix of TV, print, radio and online ad) were assessed. If one channel was not available for the product, another channel was covered multiple times. The advertisements were published between 2018 and 2019 and were extracted from the Nielsen International Ad Intel database. The number of completed assessments by country is contained in Annex II. Annex III shows the completed assessments by advertisement type.

Details from both data collection exercises were recorded in a **questionnaire**, administered centrally on an online data collection platform. The questionnaire guided the assessment. It was almost identical for both mystery shoppers and advertisement analysts, expect for small variations in wording and context-specific adaptation (e.g. colour could not be assessed for a radio advertisement).

The questionnaire was structured as follows:

1. Selection of country, product category and indication of the total number of product items within the product category and the specific product name/type;

2. Indication of whether or not an environmental claim was present;

3. Specification of logos/labels, relevant text and environmentally friendly images found, as well as any of the specified colour aspects;

4. Selection of logos/labels from a list (or upload of logo/label if not on the list), copy of (translated) logo/label text and selection of theme(s);

5. Indication of the degree to which the logo/label and its claim was clear, ambiguous, accurate and verifiable (and whether or not a link/information was provided to obtain more information about the verification);

6. Copying of (translated) text claim and selection of theme(s)

7. Indication as to which degree the text claim was clear, ambiguous, accurate and verifiable (and whether or not a link/information was provided to obtain more information about the verification).

Mystery shoppers and advertisement analysts uploaded screenshots of each webpage/advertisement and specific details they noted.

2.2.5 Creation of the inventory

Following the data collection, the claims were coded and processed for inclusion in a base inventory. Identical instances of the same claim were aggregated and appear only once in the inventory. A prime example are scheme-associated logos and labels that are used on different products and in more than one country. Text claims can also convey the same concept, albeit in slightly different wordings (for instance 'recyclable' and 'can be recycled'). In such instances they were not aggregated and included in the inventory as different unique claims.[34] The codification of the questionnaires was followed by two phases: harmonisation[35] of the themes and the misleading character of unique claims;

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[34] Text claims were aggregated only if the exact same word or wording was used (irrespective or lower case or upper case letters), or a typo was corrected.
[35] It was possible for the same unique claim to be assessed differently by the different mystery shoppers involved. With the agreement of DG ENV, it was decided to harmonise these findings. For themes, this means that if unique claim x was classified as 'Lifecycle' by mystery shopper 1 and as 'Lifecycle' and 'Lifespan' by

and coding explicit unique claims into the four classifications: mandatory schemes or requirements; voluntary ecolabelling schemes established by the EU; voluntary ecolabelling schemes established by national or regional public entities; and other claims.

2.3 Indicators on the spread and misleading character of claims

The resulting inventory allowed to determine the **prevalence of (potentially misleading) environmental claims** among products and services in each of the 52 categories within the scope of this study. More specifically, the following indicators are reported:

- Share of environmental claims;
- Share of explicit environmental claims;
    - Share of environmental logos/labels and most common logos/labels;
    - Share of environmental textual claims and most common textual claims;
    - Average number of explicit claims;
- Share of implicit environmental claims;
- Share of claims per claim theme;
    - Share of environmental logos/labels per claim theme;
    - Share of textual claims per claim theme;
- Share of potentially misleading explicit claims.

Where relevant, the shares are presented separately for mandatory schemes or requirements, voluntary ecolabelling schemes established by the EU, voluntary ecolabelling schemes established by national or regional public entities, and other claims. For simplification and readability, the category names are shortened in the table headers as 'mandatory schemes', 'EU schemes' and 'national or regional schemes'.

For consistency, the figures in the following tables are always shown **as the percentage of the total number of assessments** made (i.e. all product webpages and advertisements evaluated in the study). The total number of assessments per product and market is always the same and indicated in the first column of each table. This approach was taken to facilitate comparison between tables[36].

The tables in this report include the combined figures for both data collection methods.

Equal weights were applied if **data were aggregated**[37], i.e. the same importance was given to each product or country subsumed into a broader group. This is the case for

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mystery shopper 2, then the claim x of mystery shopper 1 was complemented with 'Lifespan'. With regard to the misleading aspect - which was based on 4 scale questions (ambiguity, clarity, accuracy and verifiable) - the modus was taken to harmonise the unique claims.

[36] For example, 120 televisions were assessed in total. 39% of those 120 televisions contained an explicit claim and 20% contained an explicit claim that was considered potentially misleading. These percentages are shown in the tables.

[37] In the 2014 study, no weighting was applied. The same number of assessments was conducted per product by region (always in one country per region), therefore this part of the weighting was not needed.

region, market, total non-food and food, and the overall total. Data for country by product level were **not weighted** for the following reasons:

- The product items were randomly selected from all items available. However, the share of the selected items out of all items available differed between web shops and countries. This discrepancy could have been accounted for by weighting according to market share, but data were not available for this. In addition, whether or the sampled stores are representative of the EU/Member States' markets remained uncertain, weakening any weighting approach.

- Following the COVID-19 outbreak in early 2020, a range of products had little or no availability in web shops. The number of available product items at the time of the data collection is thus not representative of 'typical' stock and brand diversity.

2.3.1 Share of environmental claims

An environmental claim was identified on **80% of webpages and advertisements of products/services**, ranging from 42%[38] on carpets to 97% on washing machine detergents and toilet paper[39]. The difference between food and non-food products overall is minimal (84% and 77%, respectively), with stronger variations across and within markets. Across the markets, the incidence of claims was lowest on textiles (44%) and highest on dairy products and eggs and sugar (96%).

Both food and non-food products had a higher share of implicit than explicit environmental claims (45% and 35%, respectively, in total for both food and non-food). On mobile phones and pizza, only implicit claims were identified. Large differences between both types of claims were observed for lager Pils, pre-packed bread and airlines. By contrast, the incidence of implicit claims was minimal for beef (5% implicit vs 76% explicit claims).

Claims were only categorised as implicit if no explicit claim was identified on the product. However, more than one explicit claim could have been recorded for a product (e.g. one or more logo and/or textual claim). In the overall category 'explicit environmental claim', each product is represented only once, but it could be represented both under logos/labels and textual claims.

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[38] This implies that from all carpets assessed 42% contained one or multiple environmental claims.
[39] For simplicity, this and the following sections talk about products rather than webpages and advertisements. Unless otherwise stated, both data collection methods were considered in the analysis.

Table 3: Share of environmental claims (non-food) - % of total no. assessed

	Total no. assessed	Share of environmental claims	Share of implicit environmental claims	Share of explicit environmental claims
Total	2911	80%	45%	35%
Non-food products	1484	77%	44%	33%
Consumer electronics	160	84%	54%	30%
Mobile phones	20	70%	70%	0%
Laptops	20	85%	70%	15%
Televisions	120	88%	49%	39%
Household appliances	76	83%	21%	61%
Washing machines	36	83%	16%	66%
Refrigerators	20	85%	30%	55%
Coffee machines	20	45%	40%	5%
Textiles	252	44%	32%	12%
Clothing: Sportswear women	132	44%	30%	14%
Footwear men size 42	120	43%	34%	9%
Household cleaning and storing products	316	85%	46%	39%
Washing machine detergents	280	97%	55%	43%
Rubbish bags	36	72%	40%	32%
Personal hygiene and beauty products	108	85%	35%	50%
Shampoos	36	80%	38%	43%
Skin creams	36	79%	43%	36%
Toilet paper	36	97%	26%	71%
Baby products	72	77%	50%	27%
Baby bottles	36	55%	43%	12%
Baby diapers	36	94%	61%	34%
Misc. Household	203	65%	45%	20%
Paints	120	72%	57%	15%
Windows	16	56%	19%	38%
Hardwood floors	15	75%	25%	50%
Carpets	36	42%	37%	5%
Shower heads	16	63%	38%	25%
Transport	125	89%	52%	37%
Passenger vehicles	35	88%	40%	48%
Airlines	90	90%	64%	26%
Financial services	100	78%	59%	19%
Consumer investment products	100	78%	59%	19%
Other services	72	82%	47%	35%
Hotels	36	78%	62%	16%
Household electricity services	36	85%	31%	54%

Within the **non-food category** (Table 3), the transport market showed the highest incidence of environmental claims (89%), followed by household cleaning and storing products and personal hygiene and beauty products (85%). The latter two markets also include the two products with the largest percentages: washing machine detergents and toilet paper (97%). Textiles and miscellaneous household items contained fewer claims (44% and 65%, respectively), although still a considerable number.

The share per market changes when looking at implicit and explicit claims separately. Financial services and consumer electronics had the largest share of images or colours associated with eco-friendliness[40] (59% and 54%, respectively), while household appliances and personal hygiene and beauty products had the highest prevalence of logos/labels and text that explicitly indicated that the product or service was somehow environmentally sustainable[41] (61% and 50%, respectively). Broken down by product/service, laptops and mobile phones contained most often implicit claims (both 70%) while toilet paper and washing machines had most frequently explicit claims (71% and 66%, respectively). Conversely, the lowest shares of images or colours were identified for washing machines and windows (16% and 19%, respectively) and explicit text or logos/labels were least displayed on mobile phones and coffee machines (0% and 5%, respectively).

Variations between products/services were also found within markets:

- **Consumer electronics**: Explicit environmental claims were most frequently present on televisions (39%) compared to laptops (15%) and mobile phones (0%). For televisions, this is unsurprising, given that the EU Energy label is mandatory and thus contributes to a high incidence of explicit claims. Interestingly, while no explicit claims were found for mobile phones, the proportion of implicit claims within this category (70%) is the highest among all non-food categories (along with laptops).

- **Household appliances**: Coffee machines contained considerably less explicit claims than refrigerators and washing machines (5%, 55% and 66%, respectively). The EU Energy label is mandatory for washing machines and refrigerators, and a higher share of explicit claims was expected, compared to coffee machines. While implicit claims on household appliances are most prevalent among coffee machines (40%), still less than half (45%) of the products in this category included an environmental claim (compared to 83% and 85% respectively for washing machines and refrigerators).

- **Textiles**: Women's sportswear had slightly higher, yet low shares of explicit environmental claims (14%) compared to men's footwear (9%). Conversely, men's footwear included slightly more implicit claims (34%, compared to 30% for women's sportswear). For both products, there is mandatory information that needs to be displayed, namely the textile composition of clothing and the materials used in footwear.

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[40] Images and colours (blue and green background or text) that are associated with environmental sustainability are considered implicit claims.
[41] Text/statements and logos/labels are considered explicit claims.

- **Household cleaning and storing products**: Explicit environmental claims were made more often for washing machine detergents than rubbish bags (43% and 32%, respectively), presumably since the recommended dosages are mandatory for the former. In line with this, implicit claims are also more common for washing machine detergents (55%, compared to 40% for rubbish bags).

- **Personal hygiene and beauty products**: Toilet paper had a higher incidence of explicit claims than shampoos and skin creams (71%, 43% and 36%, respectively), which reflect in the overall share of environmental claims (97%, 80% and 79%, respectively).

- **Baby products**: 94% of the baby diapers webpages and advertisements made some type of environmental claim, with 34% containing explicit claim text or logos/labels. Baby bottles showed fewer claims (55%), with a lower percentage of explicit claim content (12%).

- **Miscellaneous household**: Within this market, there are some considerable differences in terms of the incidence of explicit claims. While half of hardwood floor items included an explicit environmental claim, this proportion was only 5% among carpets and 15% for paints. For shower heads and windows, the proportion of explicit claims was 25% and 38%, respectively. When also taking into account implicit claims, a considerably higher number of hardwood floor items claimed environmental sustainability compared to carpets (75% and 42%, respectively), which is the greatest discrepancy within the market.

- **Transport**: Passenger vehicles and airlines had a similar proportion of claims (88% and 90%, respectively) but the percentage of explicit claim content was higher among passenger vehicles (48%, compared to 26% of airlines). This was expected, as it is mandatory to provide information on the fuel efficiency and CO_2 emissions of passenger vehicles.

- **Other services**: Electricity services had a considerably higher proportion of explicit claims (54%) compared to 16% for hotels. This observation is reversed which for implicit claims, where these are more common among hotels (62%) than among electricity services (31%)

Comparison with 2014 study

In the 2014 consumer market study on environmental claims for non-food products, 71% of all advertisements assessed contained a green claim (31% voluntary explicit and 65% implicit). This number is slightly higher in the current study: evaluators found an environmental claim on 78% of advertisements. However, fewer explicit claims were identified in 2020 (19%), and this percentage remains the same when we exclude mandatory claims. The same applies to implicit claims (58%) but this can be explained by the fact that in this study implicit claims were not considered if an explicit claim was identified.

Mystery shoppers in the 2020 study found 77% environmental claims in web shops. The percentage was lower in the 2014 study with 64% where assessments were done both online and offline. The number of explicit claims is similar between 2014 (50%) and 2020 (47%), although the percentage for 2020 drops to 40% when mandatory claims are excluded. While more implicit claims were flagged in 2014 (46% and 30% 2020), this can again be explained by the fact that implicit claims are only counted if explicit claims were absent.

Table 4: Share of environmental claims (food) - % of total no. assessed

	Total no. assessed	Share of environmental claims	Share of implicit environmental claims	Share of explicit environmental claims
Total	2911	80%	45%	35%
Food	1427	84%	46%	38%
Beverages	484	86%	52%	33%
Wine	110	75%	55%	21%
Lager Pils	36	84%	75%	9%
Ground coffee	192	70%	37%	33%
Bottled water	110	99%	40%	58%
Orange juice	36	100%	54%	46%
Cereals and cereal products	249	81%	59%	23%
Pre-packed bread	36	73%	66%	8%
Spaghetti pasta	177	86%	56%	30%
Rice	36	85%	55%	30%
Dairy and eggs	127	96%	46%	50%
Whole milk	91	99%	64%	35%
Eggs	36	94%	28%	66%
Fats and oils	106	95%	54%	41%
Margarine	36	97%	61%	35%
Olive oil	36	89%	41%	48%
Sunflower oil	34	100%	59%	41%
Fruits	107	72%	27%	45%
Apples	36	60%	23%	37%
Bananas	36	75%	31%	44%
Oranges	35	80%	32%	48%
Meat	72	69%	20%	49%
Poultry meat	36	64%	28%	36%
Beef	36	81%	5%	76%
Pre-prepared meals	104	78%	49%	29%
Lasagne	33	80%	54%	26%
Soup (in Tetrapak)	35	98%	38%	60%
Pizza	36	56%	56%	0%
Sugar	70	96%	56%	39%
Cane sugar	16	94%	44%	50%
Granulated white sugar	14	94%	56%	38%
Sugar	40	98%	63%	35%
Vegetables	108	80%	49%	31%
Tomatoes	36	75%	42%	33%
Canned beans	36	94%	59%	34%
Potatoes	36	70%	37%	33%

The three markets dairy and eggs, sugar, and fats and oils had the highest shares of environmental claims across the **food markets** (96%, 96% and 95%, respectively) (Table 3). Even among the market with the lowest shares, meat, a considerable number contained environmentally-friendly statements (69%). All orange juice and sunflower oil products and advertisements, and almost all bottled waters and whole milks, suggested environmental sustainability in one way or another. Claims were less frequent on pizzas and apples, although they were still present on the majority of the product items (56% and 60%, respectively).

Within the food category, cereals and cereal products and sugar most often contained an implicit claim (59% and 56%, respectively). Looking at specific products, Lager Pils and pre-packed bread contained most visual suggestions of environmental sustainability (75% and 66%, respectively). Beef, in contrast, had the lowest share of implicit claims but the highest share of explicit claims (5% vs 76%). Overall, explicit text or logos/labels were commonly shown on dairy and eggs and meat (50% and 49%, respectively). No explicit claim was identified for pizza.

As for the non-food category, the share of environmental claims varied substantially within markets. Differences can be partly explained by mandatory country of origin information on the following products: eggs, olive oil, apples, bananas, oranges, poultry and beef (both raw and unprocessed), tomatoes, canned beans and potatoes.

- **Beverages**: Looking at the market of beverages, the highest proportion of explicit claims can be observed among the categories of bottled water (58%) and orange juice (46%). This is considerably lower among the remaining three categories: 33% for ground coffee, 21% for wine and 9% for lager pils.

  While ground coffee had the lowest incidence of environmental claims within this market, the number is still notable (70%). Almost all orange juice and bottled water items made some claim about eco-friendliness. However, for orange juice, implicit claims outweighed explicit claims (54% vs 46%), while the reverse was true for bottled water (40% implicit vs 58% explicit).

- **Cereals and cereal products**: Explicit content are more often displayed on spaghetti pasta and rice within this market (both 30% compared to 8% on pre-packed bread). When including the shares of implicit claims however, the proportions were somewhat similar across pre-packed bread, spaghetti pasta and rice (66%, 56% and 55%, respectively).

- **Dairy and eggs**: The share of explicit environmental claims for eggs (66%) is always twice as high as for whole milk (35%) – and this is reversed when considering implicit claims (64% for whole milk compared to 28% for eggs).

- **Fats and oils**: Explicit claims were more common on olive oil than margarine and sunflower oil (48%, 35% and 41%, respectively) but it was the other way around for implicit claims (48%, 35% and 41%, respectively).

- **Fruits**: Explicit text or logos/labels were found to a similar extent for apples, bananas and oranges (37%, 44% and 48%, respectively), with all products required to carry information about country of origin. Environment-related positive images or colours were displayed less than logos or explicit text (23%, 31% and 32%, respectively).

- **Meat**: Explicit claims were identified twice as often on webpages or advertisements for beef than poultry (76% and 36%, respectively). Poultry was more often seen with implicit images or blue/green colours (28%, in contrast to 5% of beef).

- **Pre-prepared meals**: Soup in Tetrapak had mainly explicit claim content (60%). This was more than twice as high as for lasagne, while pizza had no explicit claim content at all. Including implicit claims, lasagne and soup had a higher share of environmental claims than pizza (80%, 98% and 56%, respectively).

- **Sugar:** While the highest share of explicit claim content was found on cane sugar (50%, compared to 38% granulated white sugar and 35% for uncategorised sugar), all categories had similarly high incidences of claims (94%, 94% and 98%, respectively).

- **Vegetables:** One-third of all three product items assessed within this market had an explicit claim: 34% for canned beans and 33% for tomatoes and potatoes. Canned beans had a high proportion of images and colours implying eco-friendliness (59%), which made its overall share of claims larger than that of tomatoes or potatoes (94%, 75% and 70%, respectively).

2.3.2 Share of explicit environmental claims

Explicit claims comprise text or logos/labels that indicate environmental sustainability in the production, delivery or selling of a product/service. As presented in Section 2.2.3, these claims can be further divided into mandatory schemes or requirements, voluntary ecolabelling schemes established by the EU, voluntary ecolabelling schemes established by national or regional public entities, and other claims (which may also reflect voluntary schemes). Annex IV provides an overview of the schemes as they apply to the product categories included in the study.

Overall, 35% of assessed items contained an explicit claim, mainly consisting of 'other' claims that were not predefined (31%). The lowest share is represented by voluntary ecolabelling schemes established by national or regional public entities (1%), while mandatory schemes make up 7% of explicit claims and voluntary ecolabelling schemes established at EU level 3%. The share of mandatory schemes was equivalent between non-food and food products, but voluntary ecolabelling schemes established at EU level were only represented in 0.4% of non-food products, compared to 6% among food products.

Table 5: Share of explicit environmental claims (non-food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims	Share of mandatory schemes	Share of EU schemes	Share of national or regional schemes	Share of other claims
Total	2911	35%	7%	3%	1%	31%
Non-food products	1484	33%	7%	0%	2%	29%
Consumer electronics	160	30%	7%	0%	0%	30%
Mobile phones	20	0%	0%	0%	0%	0%
Laptops	20	15%	0%	0%	0%	15%
Televisions	120	39%	7%	0%	0%	38%
Household appliances	76	61%	41%	0%	0%	46%
Washing machines	36	66%	41%	0%	0%	51%
Refrigerators	20	55%	0%	0%	0%	55%
Coffee machines	20	5%	0%	0%	0%	5%
Textiles	252	12%	6%	0%	0%	6%
Clothing: Sportswear women	132	14%	5%	0%	0%	11%
Footwear men size 42	120	9%	8%	0%	0%	1%
Household cleaning and storing products	316	39%	5%	1%	4%	36%
Washing machine detergents	280	43%	9%	1%	8%	35%
Rubbish bags	36	32%	0%	0%	0%	32%
Personal hygiene and beauty products	108	50%	5%	3%	4%	49%
Shampoos	36	43%	9%	3%	0%	40%
Skin creams	36	36%	0%	0%	0%	36%
Toilet paper	36	71%	6%	6%	11%	71%
Baby products	72	27%	0%	0%	14%	19%
Baby bottles	36	12%	0%	0%	0%	12%
Baby diapers	36	34%	0%	0%	20%	26%
Misc. Household	203	20%	0%	1%	0%	20%
Paints	120	15%	0%	4%	0%	12%
Windows	16	38%	0%	0%	0%	38%
Hardwood floors	15	50%	0%	0%	0%	50%
Carpets	36	5%	0%	0%	0%	5%
Shower heads	16	25%	0%	0%	0%	25%
Transport	125	37%	10%	0%	0%	28%
Passenger vehicles	35	48%	21%	0%	0%	30%
Airlines	90	26%	0%	0%	0%	26%
Financial services	100	19%	0%	0%	0%	19%
Consumer investment products	100	19%	0%	0%	0%	19%
Other services	72	35%	0%	0%	0%	35%
Hotels	36	16%	0%	0%	0%	16%
Household electricity services	36	54%	0%	0%	0%	54%

Note 1: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary

ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

Across the **non-food markets** (see table above), household appliances had the highest share of mandatory environmental claims (41%), which can be attributed to washing machines (41%). Mandatory schemes were further found on webpages or advertisements of shampoos (9%), televisions (7%), washing machine detergents (9%) and toilet paper (6%). No mandatory scheme was identified for the markets baby products, miscellaneous household items, financial services and other services, and a large range of products.

Voluntary ecolabelling schemes established at EU level were found on 6% of toilet paper and 3% of shampoos. Overall, the number of items with one of the two schemes (EU organic logo and EU Ecolabel) was low.

Voluntary ecolabelling schemes established by national or regional public entities were by far most prevalent among baby products (14%), but were not identified at all in most other markets. Looking at specific products, toilet paper and washing machine detergents had the highest shares of voluntary ecolabelling schemes established by national or regional public entities (11% and 8%, respectively).

Other (voluntary) claims not covered in the other categories were found on 49% personal hygiene and beauty products. Similar high percentages were observed for household appliances (46%). 'Other' claims were found on 71% of assessed toilet paper webpages and advertisements, as well as 55% of refrigerators and 54% of household electricity services. None were identified for mobile phones.

Comparison with 2014 study

Fewer explicit environmental claims on advertisements were recorded in the current study than in 2014 (19% and 31%, respectively). In particular the shares of textual claims differ significantly (13% in 2020 and 28% in 2014). While in 2014 no explicit claim was identified on laptops, the share in 2020 was 15%. Likewise, the share of explicit claims on televisions and baby diapers was considerably higher this year (35% and 30%, respectively, and 5% and 15% in 2014). Advertisements for hotels displayed no explicit claims in 2020 but had a share of 10% in 2014. For other products, the difference between both years was the other way around - 45% of washing machine advertisements contained an explicit claim in 2020 while this figure was 75% in 2014. 20% of household electricity services advertisements made an explicit claim this year, compared to 80% in the previous study.

In 2014 mystery shoppers identified a voluntary explicit environmental claim on 50% of products and services assessed online and offline. This is somewhat in line with the 47% identified for this study although this percentage also includes mandatory claims. Looking at 'other claims' only, the figure is lower at 40%. Different to the 2014 study, for 'other claims' more textual claims than logos/labels were identified (38% and 8%, respectively, vs 21% and 40% in 2014, respectively). In line with the outputs of the 2014 study, explicit claims on televisions only consisted of logos/labels, but the share was noticeable different (44% in reported study and 6% voluntary in 2014). Significantly fewer baby bottles and diapers contained an explicit claim in this study (25% and 38%, respectively, compared to 85% and 100% voluntary in 2014, respectively). Likewise, paints contained fewer explicit claims in the 2020 study (15% and 59% voluntary in 2014). Noteworthy, more textual explicit claims were identified on hotel webpages in this study (27% and 10% voluntary in 2014).

Table 6: Share of explicit environmental claims (food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims	Share of mandatory schemes	Share of EU schemes	Share of national or regional schemes	Share of other claims
Total	2911	35%	7%	3%	1%	31%
Food	1427	38%	7%	6%	0%	33%
Beverages	484	33%	3%	5%	0%	32%
Wine	110	21%	3%	3%	0%	19%
Lager Pils	36	9%	0%	3%	0%	6%
Ground coffee	192	33%	0%	6%	0%	33%
Bottled water	110	58%	10%	0%	0%	58%
Orange juice	36	46%	0%	16%	0%	46%
Cereals and cereal products	249	23%	4%	11%	0%	22%
Pre-packed bread	36	8%	0%	0%	0%	8%
Spaghetti pasta	177	30%	0%	13%	0%	29%
Rice	36	30%	13%	19%	0%	30%
Dairy and eggs	127	50%	10%	12%	0%	43%
Whole milk	91	35%	0%	8%	0%	35%
Eggs	36	66%	19%	16%	0%	51%
Fats and oils	106	41%	3%	10%	0%	39%
Margarine	36	35%	0%	3%	0%	35%
Olive oil	36	48%	9%	21%	0%	43%
Sunflower oil	34	41%	0%	7%	0%	41%
Fruits	107	45%	14%	4%	0%	34%
Apples	36	37%	11%	3%	0%	29%
Bananas	36	44%	13%	3%	0%	31%
Oranges	35	48%	15%	6%	0%	37%
Meat	72	49%	13%	5%	0%	38%
Poultry meat	36	36%	13%	0%	0%	23%
Beef	36	76%	46%	9%	0%	41%
Pre-prepared meals	104	29%	0%	3%	0%	29%
Lasagne	33	26%	0%	8%	0%	26%
Soup (in Tetrapak)	35	60%	0%	0%	0%	60%
Pizza	36	0%	0%	0%	0%	0%
Sugar	70	39%	6%	3%	0%	36%
Cane sugar	16	50%	0%	13%	0%	50%
Granulated white sugar	14	38%	25%	0%	0%	25%
Sugar	40	35%	0%	0%	0%	35%
Vegetables	108	31%	8%	3%	0%	26%
Tomatoes	36	33%	15%	3%	0%	28%
Canned beans	36	34%	0%	6%	0%	34%
Potatoes	36	33%	17%	0%	0%	17%

Note 2: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

Within the **food category** (see table above), mandatory schemes were most widespread across the fruits market (14%), mainly attributed to the high share among oranges (15%). Beef and granulated white sugar each had notable shares, at 46% and 25%, respectively. No mandatory claim was identified for the whole market of pre-prepared meals.

Voluntary ecolabelling schemes established at EU level were most often found on olive oil and rice (21% and 19%, respectively), and around 10% of the products represented in the markets dairy and eggs, cereals and cereal products and fats and oils. No voluntary ecolabelling schemes established by national or regional public entities were identified on food products.

As 'other claims' were most prevalent in the markets dairy and eggs, fats and oils and meat (43%, 39% and 38%, respectively), differences compared to other markets were less striking than in the mandatory and voluntary ecolabelling schemes (established by the EU or national or regional public entities) categories. The products with the highest shares of other claims were soup, bottled water, eggs and cane sugar (60%, 58%, 51% and 50%, respectively). The most frequent schemes are discussed below.

2.3.2.1 Share of environmental logos/labels and most common logos/labels

Explicit environmental claims can be displayed in the form of text and/or a logo/label. Some well-known examples include the EU Ecolabel, Green Dot or Recycled Content logo. In this study, a total of **176 unique logos** were identified of which the overwhelming majority are other logos:

- **12%** (or 20 logos) consisted of mandatory logos;
- **1%** (or 2 logos) were voluntary ecolabelling schemes established by the EU;
- **1%** (or 2 logos) were voluntary ecolabelling schemes established by national or regional public entities;
- **86%** (or 152 logos) were classified as other logos.

Logos were found more often on food than non-food products (20% and 11%, respectively), as shown in the tables below. Of the **non-food markets**, household appliances had the highest share of mandatory logos/labels by clear margin (19%) which includes washing machines with the highest share among the specific non-food products (19%). Meat was the market with the highest share of mandatory logos/labels among the **food markets** (10%), mainly attributed to beef with a share of 43% (linked to the mandatory indication of the country of origin). The shares of the other markets were comparably low or, in some cases, non-existent.

The shares of voluntary ecolabelling schemes established at EU level among non-food products was considerably lower than of mandatory schemes, while it was about the same for food products (5% and 6%, respectively). The non-food market with the highest prevalence was personal hygiene and beauty products (3%), covering toilet paper and shampoos (6% and 4%, respectively). 11% of products within the markets dairy and eggs and cereals and cereal products contained an environmental logo or label. Olive oil and rice had the highest shares (21% and 19%, respectively).

Baby products constituted the non-food market with the highest number of items containing a nationally or regionally voluntary logo/label (14%). These shares were mainly represented by baby diapers (20%). A range of assessed non-food markets and

products did not contain any voluntary logo established by national or regional public entities. In the food category, they were not identified for any product item.

The prevalence of 'other' logos/labels was highest on personal hygiene and beauty products and dairy and eggs (both 24%). Toilet paper and baby diapers were the non-food products with the greatest shares (46% and 24%, respectively), while cane sugar and eggs had the highest incidences among the food markets (38% and 34%, respectively). Overall, logos and labels belonging to this category were identified more often than mandatory or voluntary ecolabelling schemes established at EU level and by national and regional public entities.

Table 7: Share of environmental logos/labels (non-food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims - logos/ labels	Share of mandatory schemes – logos/ labels	Share of EU schemes– logos/labels	Share of national or regional schemes– logos/label s	Share of other claims – logos/label s
Total	2911	16%	4%	3%	1%	10%
Non-food products	1484	11%	3%	0%	2%	7%
Consumer electronics	160	10%	6%	0%	0%	4%
Mobile phones	20	0%	0%	0%	0%	0%
Laptops	20	0%	0%	0%	0%	0%
Televisions	120	17%	6%	0%	0%	11%
Household appliances	76	25%	19%	0%	0%	6%
Washing machines	36	29%	19%	0%	0%	10%
Refrigerators	20	10%	0%	0%	0%	10%
Coffee machines	20	5%	0%	0%	0%	5%
Textiles	252	1%	0%	0%	0%	1%
Clothing: Sportswear women	132	1%	0%	0%	0%	1%
Footwear men size 42	120	1%	0%	0%	0%	1%
Household cleaning and storing products	316	16%	3%	1%	4%	9%
Washing machine detergents	280	25%	6%	1%	7%	13%
Rubbish bags	36	3%	0%	0%	0%	3%
Personal hygiene and beauty products	108	28%	5%	3%	4%	24%
Shampoos	36	20%	9%	3%	0%	18%
Skin creams	36	8%	0%	0%	0%	8%
Toilet paper	36	55%	6%	6%	11%	46%
Baby products	72	21%	0%	0%	14%	13%
Baby bottles	36	3%	0%	0%	0%	3%
Baby diapers	36	31%	0%	0%	20%	24%
Misc. Household	203	2%	0%	1%	0%	1%
Paints	120	5%	0%	4%	0%	1%
Windows	16	0%	0%	0%	0%	0%
Hardwood floors	15	0%	0%	0%	0%	0%
Carpets	36	3%	0%	0%	0%	3%
Shower heads	16	0%	0%	0%	0%	0%
Transport	125	3%	0%	0%	0%	3%
Passenger vehicles	35	3%	0%	0%	0%	3%
Airlines	90	4%	0%	0%	0%	4%
Financial services	100	2%	0%	0%	0%	2%
Consumer investment products	100	2%	0%	0%	0%	2%
Other services	72	7%	0%	0%	0%	7%
Hotels	36	3%	0%	0%	0%	3%
Household electricity services	36	12%	0%	0%	0%	12%

Note 3: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary

ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

Table 8: Share of environmental logos/labels (food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims - logos/ labels	Share of mandatory schemes – logos/ labels	Share of EU schemes– logos/ labels	Share of national or regional schemes – logos/ labels	Share of other claims – logos/ labels
Total	2911	16%	4%	3%	1%	10%
Food	1427	20%	5%	6%	0%	13%
Beverages	484	13%	3%	5%	0%	8%
Wine	110	10%	3%	3%	0%	6%
Lager Pils	36	6%	0%	3%	0%	3%
Ground coffee	192	17%	0%	6%	0%	16%
Bottled water	110	18%	10%	0%	0%	12%
Orange juice	36	16%	0%	16%	0%	3%
Cereals and cereal products	249	15%	4%	11%	0%	11%
Pre-packed bread	36	5%	0%	0%	0%	5%
Spaghetti pasta	177	16%	0%	13%	0%	11%
Rice	36	24%	13%	19%	0%	18%
Dairy and eggs	127	32%	8%	11%	0%	24%
Whole milk	91	19%	0%	7%	0%	15%
Eggs	36	46%	17%	16%	0%	34%
Fats and oils	106	17%	2%	10%	0%	10%
Margarine	36	6%	0%	3%	0%	6%
Olive oil	36	29%	6%	21%	0%	8%
Sunflower oil	34	14%	0%	7%	0%	14%
Fruits	107	19%	4%	4%	0%	14%
Apples	36	10%	3%	3%	0%	10%
Bananas	36	22%	0%	3%	0%	19%
Oranges	35	24%	7%	6%	0%	14%
Meat	72	28%	10%	5%	0%	15%
Poultry meat	36	18%	10%	0%	0%	8%
Beef	36	64%	43%	9%	0%	21%
Pre-prepared meals	104	10%	0%	3%	0%	10%
Lasagne	33	21%	0%	8%	0%	21%
Soup (in Tetrapak)	35	10%	0%	0%	0%	10%
Pizza	36	0%	0%	0%	0%	0%
Sugar	70	25%	6%	3%	0%	22%
Cane sugar	16	38%	0%	13%	0%	38%
Granulated white sugar	14	31%	25%	0%	0%	19%
Sugar	40	15%	0%	0%	0%	15%
Vegetables	108	17%	7%	3%	0%	7%
Tomatoes	36	26%	13%	3%	0%	13%
Canned beans	36	16%	0%	6%	0%	9%
Potatoes	36	18%	17%	0%	0%	1%

Note 4: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

The EU Energy label and the Nordic Ecolabel were most often found on non-food products (see table below)[42]. However, their larger share can be mainly attributed to a small number of product categories: 20% of baby diapers and 11% of toilet paper carried the Nordic Ecolabel. The EU Energy label was most frequently identified on washing machines and televisions (19% and 6%, respectively), where it actually is mandatory to display it. Likewise, the presence of other logos/labels was mainly limited to a few products/services. The OLED logo (organic light-emitting diode) was observed on 10% of all televisions, while the FSC logo was found on 16% of all baby diapers assessed.

Note that schemes may have been displayed in form of text or were recorded as textual claim and are therefore not represented in the following tables. Whether the scheme was categorised as logo/label or text was at the discretion of the evaluator.

The 10 most common logos/labels in the non-food category constituted a mix of mandatory, voluntary ecolabelling schemes established at EU level and nationally certified and other environmental logos/labels[43]. They can be classified as follows:

Table 9: Most common environmental logos/labels – top 10 (non-food) - % of total no. assessed

Mandatory logo/label	Voluntary ecolabelling schemes established by the EU in the form of a logo/label	Voluntary ecolabelling schemes established by national or regional public entities in the form of a logo/label	Other logos/labels
EU Energy label Green Dot	EU Ecolabel	Nordic Ecolabel	FSC Oekotex Mobius Loop Key Flag (made in Finland) Sustainable Development Goals Organic LED

Table 10: Most common environmental logos/labels – top 10 (food) - % of total no. assessed

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42 The minimal differences (in percentages) with the other logos/labels may not allow for unequivocal conclusions about the comparison.
43 Definitions of the schemes that fall within the first three categories are provided in Section 2.1.2 and Annex IV.

	Total no. assessed	EU Energy label	Nordic Ecolabel	FSC	Green dot	EU Ecolabel	Oekotex	Mobius Loop	Key Flag	SDG	Organic LED
Total	2911	1.3%	1.1%	1.0%	1.5%	0.5%	0.2%	0.5%	0.4%	0.2%	0.2%
Non-food products	1484	2.5%	2.1%	1.1%	0.8%	0.4%	0.4%	0.4%	0.4%	0.3%	0.3%
Consumer electronics	160	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.4%
Mobile phones	20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Laptops	20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Televisions	120	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	10.1%
Household appliances	76	18.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Washing machines	36	18.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Refrigerators	20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Coffee machines	20	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Textiles	252	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	0.0%
Clothing: Sportswear women	132	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Footwear men size 42	120	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%
Household cleaning and storing products	316	0.0%	3.8%	0.0%	3.2%	0.6%	0.0%	0.6%	1.5%	0.0%	0.0%
Washing machine detergents	280	0.0%	7.1%	0.0%	6.3%	1.2%	0.0%	1.2%	1.5%	0.0%	0.0%
Rubbish bags	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Personal hygiene and beauty products	108	0.0%	3.8%	3.1%	5.2%	2.9%	0.0%	3.1%	1.7%	0.0%	0.0%

	Total no. assessed	EU Energy label	Nordic Ecolabel	FSC	Green dot	EU Ecolabel	Oekotex	Mobius Loop	Key Flag	SDG	Organic LED
Shampoos	36	0.0%	0.0%	0.0%	9.4%	2.5%	0.0%	3.1%	0.0%	0.0%	0.0%
Skin creams	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Toilet paper	36	0.0%	11.3%	9.4%	6.3%	6.3%	0.0%	6.3%	5.0%	0.0%	0.0%
Baby products	72	0.0%	13.8%	7.8%	0.0%	0.0%	4.1%	0.0%	0.0%	0.0%	0.0%
Baby bottles	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Baby diapers	36	0.0%	20.0%	15.6%	0.0%	0.0%	8.1%	0.0%	0.0%	0.0%	0.0%
Misc. Household	203	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%
Paints	120	0.0%	0.0%	0.0%	0.0%	4.2%	0.0%	0.0%	0.0%	0.0%	0.0%
Windows	16	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Hardwood floors	15	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Carpets	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Shower heads	16	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Transport	125	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.8%	0.0%
Passenger vehicles	35	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Airlines	90	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.6%	0.0%
Financial services	100	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Consumer investment products	100	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other services	72	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.6%	0.0%
Hotels	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Household electricity services	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%

The EU organic logo was identified on 6% of all food products assessed, most frequently on rice (19%), orange juice and eggs (16% each) (see table below). Some proportions were particularly notable: a considerable number of cane sugar packages had the Fairtrade logo (31%)[44], 13% of granulated white sugar carried the FSC logo, and all whole milks showed the Tidyman.

No predefined nationally or regionally certified eco logo/label was in the 10 most common logos/labels. Overall, they can be categorised as follows:

Table 11: Most common environmental logos/labels – top 10 (food) - % of total no. assessed

Mandatory logo/label	Voluntary ecolabelling schemes established by the EU in the form of a logo/label	Voluntary ecolabelling schemes established by national or regional public entities in the form of a logo/label	Other logos/labels:
Green Dot	EU organic label	N/A	AB (Agriculture Biologique) Fairtrade FSC Bord Bia Quality Assurance schemes Gott Fran Finland Haltungs-form Stallhaltung Ruokaa Omasta Maasta Tidyman

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44 'The Forest Stewardship Council® (FSC) promotes environmentally appropriate, socially beneficial, and economically viable management of the world's forests. […] Certification is voluntary. It involves an inspection of the forest management by an independent organisation to check that it passes the internationally agreed FSC principles and criteria of good forest management' (Ecolabel Index description).

	Total no. assessed	EU Organic label	Green dot	AB	Fairtrade	FSC	Bord Bia Quality Assurance schemes	Gott Fran Finland	Haltungs-form Stallhaltung	Ruokaa Omasta Maasta	Tidyman
Total	2911	2.8%	1.5%	0.7%	0.7%	1.0%	0.5%	0.4%	0.3%	0.3%	0.5%
Food	1427	5.7%	2.2%	1.4%	1.3%	0.9%	0.9%	0.8%	0.7%	0.7%	0.6%
Beverages	484	5.4%	2.6%	0.2%	1.6%	0.2%	0.2%	0.0%	0.0%	0.0%	0.6%
Wine	110	2.9%	2.7%	0.8%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Lager Pils	36	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%
Ground coffee	192	5.5%	0.0%	0.0%	7.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Bottled water	110	0.0%	10.3%	0.0%	0.0%	0.9%	1.0%	0.0%	0.0%	0.0%	0.0%
Orange juice	36	15.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Cereals and cereal products	249	9.5%	4.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%
Pre-packed bread	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Spaghetti pasta	177	9.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%	0.0%
Rice	36	18.8%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Dairy and eggs	127	11.3%	4.7%	0.0%	0.0%	4.4%	0.0%	1.6%	0.0%	5.9%	0.5%
Whole milk	91	6.9%	0.0%	0.0%	0.0%	6.3%	0.0%	0.0%	0.0%	0.0%	100%
Eggs	36	15.6%	9.4%	0.0%	0.0%	2.5%	0.0%	3.1%	0.0%	11.9%	0.0%
Fats and oils	106	10.3%	2.1%	1.9%	0.0%	0.0%	0.0%	1.7%	0.0%	0.0%	0.0%
Margarine	36	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Olive oil	36	21.3%	6.3%	5.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sunflower oil	34	6.7%	0.0%	0.0%	0.0%	0.0%	0.0%	5.0%	0.0%	0.0%	0.0%
Fruits	107	4.1%	0.0%	0.9%	1.0%	0.0%	2.0%	0.0%	0.0%	0.0%	0.0%
Apples	36	3.1%	0.0%	0.0%	0.0%	0.0%	3.1%	0.0%	0.0%	0.0%	0.0%
Bananas	36	3.1%	0.0%	0.0%	3.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Oranges	35	5.9%	0.0%	2.8%	0.0%	0.0%	2.8%	0.0%	0.0%	0.0%	0.0%
Meat	72	1.6%	0.0%	0.0%	0.0%	0.0%	5.9%	0.0%	6.3%	0.0%	1.6%
Poultry meat	36	0.0%	0.0%	0.0%	0.0%	0.0%	10.0%	0.0%	0.0%	0.0%	0.0%
Beef	36	3.1%	0.0%	0.0%	0.0%	0.0%	7.5%	0.0%	12.5%	0.0%	3.1%
Pre-prepared meals	104	2.7%	0.0%	3.1%	0.0%	0.8%	0.0%	0.0%	0.0%	0.0%	0.0%

	Total no. assessed	EU Organic label	Green dot	AB	Fairtrade	FSC	Bord Bia Quality Assurance schemes	Gott Fran Finland	Haltungs-form Stallhaltung	Ruokaa Omasta Maasta	Tidyman
Lasagne	33	8.1%	0.0%	5.6%	0.0%	2.5%	0.0%	0.0%	0.0%	0.0%	0.0%
Soup (in Tetrapak)	35	0.0%	0.0%	3.6%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Pizza	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Sugar	70	3.1%	6.3%	4.1%	9.1%	3.1%	0.0%	3.8%	0.0%	0.0%	0.0%
Cane sugar	16	12.5%	0.0%	6.3%	31.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Granulated white sugar	14	0.0%	25.0%	0.0%	0.0%	12.5%	0.0%	0.0%	0.0%	0.0%	0.0%
Sugar	40	0.0%	0.0%	5.0%	2.5%	0.0%	0.0%	7.5%	0.0%	0.0%	0.0%
Vegetables	108	3.1%	0.0%	2.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	3.1%
Tomatoes	36	3.1%	0.0%	8.7%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Canned beans	36	6.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	9.4%
Potatoes	36	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%

2.3.2.2 Share of environmental textual claims and most common textual claims

Textual environmental claims were found on 30% of all products. A total of **971 unique textual claims** were identified in the study of which the main part – similar as with the environmental logos/labels – consists of other textual claims:

- **7%** (or 74 textual claims) were mandatory textual claims;
- **1%** (or 8 textual claims) were voluntary textual schemes established by the EU;
- **2%** (or 17 textual claims) were voluntary textual schemes established by national or regional public entities;
- **90%** (or 872 textual claims) were classified as other textual claims.

The difference between non-food and food products was very small, overall, at 29% and 30%, respectively. For both categories, non-food and food, the share of 'other' textual claims was the highest by a clear margin. In total, 4% of all products and services assessed made a mandatory textual claim. Only a very small number contained voluntary ecolabelling schemes established at EU level, which is no surprise given that these (EU organic logo and EU Ecolabel) are usually displayed as logo/label.

At least half of the following products made a textual environmental claim: washing machines, household electricity services, toilet paper and hardwood floors. Household appliances overall had a share of 55%. Mandatory requirements were most often displayed in text form on washing machines and passenger vehicles (56% and 21%, respectively). Washing machine detergents contained in 1% of cases an EU-level and in 6% a nationally or regionally voluntary textual claim. Voluntary ecolabelling schemes established by national or regional public entities in text form were present on almost one-tenth of baby diapers (9%). As mentioned above, products had most a textual claim that was not categorised as mandatory or voluntary ecolabelling schemes established at EU level or by national or regional public entities. 54% of household electricity services and 50% of both toilet paper and hardwood floors made such an uncategorised claim.

Of the food products, soup in Tetrapak, bottled water and cane sugar most often contained an environmental textual claim (60%, 54% and 50%, respectively). However, these are all uncategorised claims. Mandatory schemes had the highest incidence rate on granulated white sugar and bananas (25% and 13%, respectively). 8% of each oranges and apples indicated a mandatory requirement, leading fruits being the market with the greatest share (10%). Text representing voluntary ecolabelling schemes established at EU level was only identified on whole milk and ground coffee (3% and 1%, respectively). Voluntary ecolabelling schemes established by national or regional public entities were not found at all in text form on food products.

Table 12: Share of environmental textual claims (non-food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims - text	Share of mandatory schemes – text	Share of EU schemes – text	Share of national or regional schemes – text	Share of other claims – text
Total	2911	30%	4%	0%	0%	27%
Non-food products	1484	29%	5%	0%	1%	26%
Consumer electronics	160	28%	0%	0%	0%	27%
Mobile phones	20	0%	0%	0%	0%	0%
Laptops	20	15%	0%	0%	0%	15%
Televisions	120	31%	1%	0%	0%	31%
Household appliances	76	55%	34%	0%	0%	40%
Washing machines	36	56%	34%	0%	0%	41%
Refrigerators	20	45%	0%	0%	0%	45%
Coffee machines	20	0%	0%	0%	0%	0%
Textiles	252	11%	6%	0%	0%	5%
Clothing: Sportswear women	132	14%	5%	0%	0%	10%
Footwear men size 42	120	8%	8%	0%	0%	0%
Household cleaning and storing products	316	35%	2%	0%	3%	31%
Washing machine detergents	280	34%	3%	1%	6%	28%
Rubbish bags	36	32%	0%	0%	0%	32%
Personal hygiene and beauty products	108	38%	0%	0%	0%	38%
Shampoos	36	31%	0%	0%	0%	31%
Skin creams	36	34%	0%	0%	0%	34%
Toilet paper	36	50%	0%	0%	0%	50%
Baby products	72	18%	0%	0%	5%	18%
Baby bottles	36	9%	0%	0%	0%	9%
Baby diapers	36	26%	0%	0%	9%	26%
Misc. Household	203	20%	0%	1%	0%	19%
Paints	120	14%	0%	3%	0%	11%
Windows	16	38%	0%	0%	0%	38%
Hardwood floors	15	50%	0%	0%	0%	50%
Carpets	36	5%	0%	0%	0%	5%
Shower heads	16	25%	0%	0%	0%	25%
Transport	125	35%	10%	0%	0%	26%
Passenger vehicles	35	45%	21%	0%	0%	27%
Airlines	90	25%	0%	0%	0%	25%
Financial services	100	17%	0%	0%	0%	17%
Consumer investment products	100	17%	0%	0%	0%	17%
Other services	72	34%	0%	0%	0%	34%
Hotels	36	13%	0%	0%	0%	13%
Household electricity services	36	54%	0%	0%	0%	54%

Note 5: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

Table 13: Share of environmental textual claims (food) - % of total no. assessed

	Total no. assessed	Share of explicit environmental claims - text	Share of mandatory schemes – text	Share of EU schemes – text	Share of national or regional schemes – text	Share of other claims – text
Total	2911	30%	4%	0%	0%	27%
Food	1427	30%	3%	0%	0%	28%
Beverages	484	29%	0%	0%	0%	29%
Wine	110	17%	0%	0%	0%	17%
Lager Pils	36	3%	0%	0%	0%	3%
Ground coffee	192	24%	0%	1%	0%	24%
Bottled water	110	54%	0%	0%	0%	54%
Orange juice	36	46%	0%	0%	0%	46%
Cereals and cereal products	249	21%	0%	0%	0%	21%
Pre-packed bread	36	8%	0%	0%	0%	8%
Spaghetti pasta	177	28%	0%	0%	0%	28%
Rice	36	28%	0%	0%	0%	28%
Dairy and eggs	127	32%	1%	2%	0%	31%
Whole milk	91	27%	0%	3%	0%	27%
Eggs	36	37%	3%	0%	0%	34%
Fats and oils	106	40%	1%	0%	0%	39%
Margarine	36	35%	0%	0%	0%	35%
Olive oil	36	46%	3%	0%	0%	43%
Sunflower oil	34	41%	0%	0%	0%	41%
Fruits	107	35%	10%	0%	0%	26%
Apples	36	34%	8%	0%	0%	26%
Bananas	36	28%	13%	0%	0%	19%
Oranges	35	37%	8%	0%	0%	29%
Meat	72	29%	3%	0%	0%	26%
Poultry meat	36	21%	3%	0%	0%	18%
Beef	36	29%	6%	0%	0%	26%
Pre-prepared meals	104	27%	0%	0%	0%	27%
Lasagne	33	21%	0%	0%	0%	21%
Soup (in Tetrapak)	35	60%	0%	0%	0%	60%
Pizza	36	0%	0%	0%	0%	0%
Sugar	70	34%	6%	0%	0%	31%
Cane sugar	16	50%	0%	0%	0%	50%
Granulated white sugar	14	31%	25%	0%	0%	19%
Sugar	40	28%	0%	0%	0%	28%
Vegetables	108	23%	1%	0%	0%	22%
Tomatoes	36	32%	5%	0%	0%	28%
Canned beans	36	25%	0%	0%	0%	25%
Potatoes	36	15%	0%	0%	0%	15%

Note 6: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary

ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

The exact same text was rarely found on the different web shops and advertisements that were assessed. On non-food products, 'energy efficiency' was spotted the most times (about 19 in total). The most common text on food products was 'organic' (about 67 in total), followed by 'bio' (about 17 in total).

Note that schemes may have been displayed in form of a logo/label or were recorded as such and are therefore not represented in the following tables. Whether the scheme was categorised as logo/label or text was at the discretion of the evaluator.

Table 14: Most common textual claims (non-food) - % of total no. assessed

Textual claim	Non-food (% total no. assessed)
Total no. assessed	1484
Energy efficiency	1.3%
At the same time, the series is Nordic ecolabelled and dermatologically tested.	0.6%
Bambo nature is designed for you who do not compromise on the environment, quality or the health of your child.	0.6%
Environment	0.6%
Sustainability	0.6%
Natural	0.5%
This product is Nordic ecolabelled	0.5%
Eco-friendly	0.4%
Extremely durable new generation paint	0.3%
Environmental policy	0.3%
A+++	0.3%
A+++ energy rating	0.3%
An a+++ energy rating	0.3%
Energy class a +++ - 70%.	0.3%
Energy class: a+++	0.3%

Table 15: Most common textual claims (food) - % of total no. assessed

Textual claim	Food (% total no. assessed)
Total no. assessed	1427
Organic	4.7%
Bio	1.2%
Eco	0.7%
Green dot	0.7%
Raised on the ground without the use of antibiotics	0.6%
100% vegetables	0.5%
Zero preservatives	0.5%
100% vegetable	0.4%
FSC, forest stewardship council	0.4%
Natural mineral water	0.4%
Biologic	0.3%
Fair trade product	0.3%
FSC - mix	0.3%
FSC - mix - www.fsc.org, mixed, packaging from responsible sources, FSC c0133690	0.3%
Packaging is of recycled paper	0.3%

2.3.2.3 Average number of explicit claims

In order to generate relevant data on the average number of explicit claims that can be found on products and services, the analysis was conducted for those products and services that included at least one explicit claim. Indeed, it was possible for mystery shoppers and advertisement analysts to record more than one explicit environmental claim, i.e. logo/label or text, on a single item. As such, the indicators below allow to easily identify whether there is typically more than one explicit environmental claim for a given product category.

While each product was counted only once in the figures of each column in the other report sections of the inventory[45], this section describes the average number of explicit claims identified on a single item (i.e. 1 represents one explicit claim). Explicit claims are further broken down by their mandatory and voluntary character. Annex V includes a similar overview for the entire sample of products and services that were assessed, thus also those without any explicit environmental claim.

On average, one product item contained more than two (2.12) explicit environmental claims. The average was lower for logos/labels (0.62) than for textual claims (1.50). An average of 1.74 uncategorised claims were found on each item. Voluntary ecolabelling schemes established at EU level or by national or regional public entities in form of text had the lowest average number of claims. Non-food products more frequently displayed an explicit claim than food products, but the difference is rather small (2.24 and 2.02, respectively).

On average, baby diapers displayed more than four (4.24) explicit claims, with a higher incidence of textual claims (2.69) than logos or labels (1.56). Carpets (4) is the other

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[45] For accuracy in showing the share of all product items assessed.

non-food product category were at least four explicit environmental claims were displayed. Furthermore, the highest average number of explicit claims were found among household electricity services (2.94) and toilet paper (2.81). The average of logos/labels was the highest for baby diapers and toilet paper (1.56 and 1.23, respectively) while carpets and diapers had the most textual claims (2.80 and 2.69, respectively).

Rice and spaghetti pasta (both product categories in the market of cereals and cereal products) had the highest average explicit environmental claims (2.96 and 2.8, respectively). For rice, this claim was most often in the form of a logo or label (1.63, compared to an average of 1.33 textual claims). The average of 1.63 logos/labels found on rice is also the highest among all food product categories, followed by lasagne with an average of 1.61 logo/label claims found on each product. On average, every margarine item in contained an average of 2.29 textual claims. Next to this, apples are the only other product category that includes on average more than 2 (2.06) textual claims.

Table 16: Average number of explicit claims (non-food)

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims –	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Total	2.12	0.24	0.10	0.04	1.74	0.62	0.12	0.10	0.03	0.38	1.50	0.13	0	0.01	1.36
Non-food products	2.24	0.29	0.02	0.09	1.84	0.47	0.10	0.01	0.06	0.28	1.78	0.19	0	0.03	1.55
Consumer electronics	2.46	0.22	0	0	2.24	0.32	0.21	0	0	0.12	2.14	0.01	0	0	2.13
Mobile phones															
Laptops	2.00	0	0	0	2.00	0	0	0	0	0	2.00	0	0	0	2.00
Televisions	2.11	0.18	0	0	1.93	0.43	0.16	0	0	0.27	1.68	0.02	0	0	1.66
Household appliances	2.52	0.87	0	0	1.66	0.40	0.31	0	0	0.10	2.12	0.56	0	0	1.56
Washing machines	2.47	0.80	0	0	1.67	0.43	0.28	0	0	0.15	2.04	0.52	0	0	1.52
Refrigerators	1.27	0	0	0	1.27	0.18	0	0	0	0.18	1.09	0	0	0	1.09
Coffee machines	1.00	0	0	0	1.00	1.00	0	0	0	1.00	0	0	0	0	0
Textiles	1.14	0.60	0	0	0.55	0.09	0	0	0	0.09	1.05	0.60	0	0	0.46
Clothing: Sportswear women	1.16	0.34	0	0	0.82	0.09	0	0	0	0.09	1.07	0.34	0	0	0.73
Footwear men size 42	1.12	1.02	0	0	0.10	0.10	0	0	0	0.10	1.02	1.02	0	0	0

Household cleaning and storing products	2.07	0.15	0.03	0.18	1.70	0.55	0.08	0.01	0.10	0.34	1.52	0.07	0.01	0.08	1.36
Washing machine detergents	2.17	0.24	0.05	0.33	1.52	0.79	0.15	0.03	0.17	0.40	1.39	0.09	0.02	0.15	1.12
Rubbish bags	1.98	0	0	0	1.98	0.19	0	0	0	0.19	1.79	0	0	0	1.79
Personal hygiene and beauty products	2.28	0.10	0.06	0.08	2.05	0.86	0.10	0.06	0.08	0.63	1.42	0	0	0	1.42
Shampoos	1.96	0.22	0.06	0	1.68	0.81	0.22	0.06	0	0.53	1.15	0	0	0	1.15
Skin creams	1.64	0	0	0	1.64	0.21	0	0	0	0.21	1.43	0	0	0	1.43
Toilet paper	2.81	0.09	0.09	0.16	2.47	1.23	0.09	0.09	0.16	0.89	1.58	0	0	0	1.58
Baby products	3.03	0	0	0.74	2.29	1.17	0	0	0.51	0.66	1.86	0	0	0.23	1.63
Baby bottles	1.00	0	0	0	1.00	0.25	0	0	0	0.25	0.75	0	0	0	0.75
Baby diapers	4.24	0	0	0.96	3.28	1.56	0	0	0.59	0.96	2.69	0	0	0.37	2.31
Misc. Household	1.42	0	0.07	0	1.35	0.12	0	0.04	0	0.08	1.30	0	0.03	0	1.27
Paints	1.48	0	0.49	0	1.00	0.33	0	0.28	0	0.06	1.15	0	0.21	0	0.94
Windows	1.33	0	0	0	1.33	0	0	0	0	0	1.33	0	0	0	1.33
Hardwood floors	1.00	0	0	0	1.00	0	0	0	0	0	1.00	0	0	0	1.00
Carpets	4.00	0	0	0	4.00	1.20	0	0	0	1.20	2.80	0	0	0	2.80
Shower heads	1.25	0	0	0	1.25	0	0	0	0	0	1.25	0	0	0	1.25
Transport	1.76	0.51	0	0	1.25	0.09	0	0	0	0.09	1.67	0.51	0	0	1.16
Passenger vehicles	1.68	0.79	0	0	0.89	0.05	0	0	0	0.05	1.63	0.79	0	0	0.84
Airlines	1.90	0	0	0	1.90	0.17	0	0	0	0.17	1.74	0	0	0	1.74
Financial services	1.94	0	0	0	1.94	0.12	0	0	0	0.12	1.81	0	0	0	1.81

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims – logos/labels	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Consumer investment products	1.94	0	0	0	1.94	0.12	0	0	0	0.12	1.81	0	0	0	1.81
Other services	2.60	0	0	0	2.60	0.39	0	0	0	0.39	2.20	0	0	0	2.20
Hotels	1.42	0	0	0	1.42	0.16	0	0	0	0.16	1.26	0	0	0	1.26
Household electricity services	2.94	0	0	0	2.94	0.46	0	0	0	0.46	2.48	0	0	0	2.48

Table 17: Average number of explicit claims (food)

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims – logos/labels	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Total	2.12	0.24	0.10	0.04	1.74	0.62	0.12	0.10	0.03	0.38	1.50	0.13	0	0.01	1.36
Food	2.02	0.20	0.17	0	1.65	0.76	0.13	0.17	0	0.46	1.26	0.07	0	0	1.19
Beverages	2.02	0.08	0.17	0	1.78	0.59	0.08	0.16	0	0.35	1.43	0	0	0	1.43
Wine	2.32	0.13	0.14	0	2.05	0.74	0.13	0.14	0	0.47	1.57	0	0	0	1.57
Lager Pils	2.21	0	0.36	0	1.86	1.07	0	0.36	0	0.71	1.14	0	0	0	1.14
Ground coffee	2.51	0	0.18	0	2.34	0.86	0	0.17	0	0.70	1.64	0	0.02	0	1.64
Bottled water	1.90	0.18	0	0	1.72	0.39	0.18	0	0	0.21	1.51	0	0	0	1.51
Orange juice	1.66	0	0.34	0	1.32	0.48	0	0.34	0	0.14	1.18	0	0	0	1.18
Cereals and cereal products	2.85	0.18	0.47	0	2.20	1.25	0.18	0.47	0	0.59	1.60	0	0	0	1.60
Pre-packed bread	2.67	0	0	0	2.67	1.00	0	0	0	1.00	1.67	0	0	0	1.67

Spaghetti pasta	2.80	0	0.44	0	2.36	0.94	0	0.44	0	0.50	1.85	0	0	0	1.85
Rice	2.96	0.42	0.63	0	1.92	1.63	0.42	0.63	0	0.58	1.33	0	0	0	1.33
Dairy and eggs	2.08	0.19	0.25	0	1.65	1.05	0.17	0.22	0	0.66	1.03	0.02	0.03	0	0.98
Whole milk	2.02	0	0.29	0	1.77	0.69	0	0.20	0	0.49	1.33	0	0.09	0	1.27
Eggs	2.11	0.30	0.24	0	1.58	1.25	0.26	0.24	0	0.75	0.87	0.04	0	0	0.83
Fats and oils	2.35	0.08	0.28	0	1.99	0.65	0.05	0.28	0	0.32	1.69	0.03	0	0	1.66
Margarine	2.55	0	0.09	0	2.46	0.26	0	0.09	0	0.18	2.29	0	0	0	2.29
Olive oil	2.25	0.18	0.51	0	1.56	0.86	0.13	0.51	0	0.22	1.39	0.05	0	0	1.34
Sunflower oil	2.23	0	0.16	0	2.07	0.69	0	0.16	0	0.53	1.54	0	0	0	1.54
Fruits	1.99	0.31	0.11	0	1.56	0.58	0.09	0.11	0	0.38	1.40	0.22	0	0	1.18
Apples	2.50	0.31	0.08	0	2.11	0.45	0.08	0.08	0	0.28	2.06	0.22	0	0	1.83
Bananas	1.95	0.29	0.14	0	1.52	0.81	0	0.14	0	0.67	1.14	0.29	0	0	0.86
Oranges	1.51	0.32	0.12	0	1.07	0.56	0.14	0.12	0	0.30	0.95	0.17	0	0	0.78
Meat	1.41	0.28	0.09	0	1.04	0.65	0.21	0.09	0	0.35	0.76	0.07	0	0	0.69
Poultry meat	1.31	0.36	0	0	0.95	0.50	0.28	0	0	0.22	0.81	0.09	0	0	0.72
Beef	1.54	0.63	0.12	0	0.79	1.06	0.56	0.12	0	0.38	0.48	0.07	0	0	0.41
Pre-prepared meals	2.09	0	0.09	0	2.00	0.60	0	0.09	0	0.51	1.49	0	0	0	1.49
Lasagne	2.71	0	0.32	0	2.39	1.61	0	0.32	0	1.29	1.10	0	0	0	1.10
Soup (in Tetrapak)	1.83	0	0	0	1.83	0.17	0	0	0	0.17	1.66	0	0	0	1.66
Pizza															
Sugar	2.18	0.32	0.08	0	1.79	0.92	0.16	0.08	0	0.68	1.26	0.16	0	0	1.10
Cane sugar	2.38	0	0.25	0	2.13	1.13	0	0.25	0	0.88	1.25	0	0	0	1.25
Granulated white sugar	2.67	1.33	0	0	1.33	1.17	0.67	0	0	0.50	1.50	0.67	0	0	0.83
Sugar	1.79	0	0	0	1.79	0.64	0	0	0	0.64	1.14	0	0	0	1.14
Vegetables	1.63	0.29	0.10	0	1.24	0.60	0.24	0.10	0	0.26	1.03	0.05	0	0	0.98
Tomatoes	2.32	0.60	0.09	0	1.63	1.00	0.40	0.09	0	0.51	1.32	0.20	0	0	1.12
Canned beans	1.71	0	0.18	0	1.53	0.45	0	0.18	0	0.27	1.25	0	0	0	1.25

Potatoes	1.00	0.50	0	0	0.50	0.54	0.50	0	0	0.04	0.46	0	0	0	0.46

2.3.3 Share of implicit environmental claims

Almost half of the items on web shops and advertisements contained an implicit claim (45%): 29% with environmental images and 38% with a blue or green background or text font[46]. The share of environmental colours is the same for food and non-food products (both 38%). Images associated with eco-friendliness were more often found on food products (33% compared to 24% on non-food products), as expected, given the origin (of ingredients) of these products.

Among the non-food markets, financial services and consumer electronics had the highest share of implicit environmental claims (59% and 54%, respectively). In comparison, household appliances and textiles contained only in about half as many cases implicit claims (21% and 32%, respectively). Financial services also had the highest share of environmental colours (49%), while products within the transport market most often had an image related to eco-friendliness.

About two-third of items in the categories of mobile phones, laptops and airlines made some kind of implicit environmental claim (70%, 70% and 64%, respectively). These three products also led the list for presence of blue or green colours. However, fewer laptops than the average contained an environment-related image (15%), while televisions had the second highest share of images (44%), after airlines (49%). No environmental image was observed on hardwood floors.

Comparison with 2014 study[47]

Shares of implicit environmental claims on advertisements are similar between 2014 and 2020. Overall, 58% of advertisements contained an implicit claim in the reported study (31% images and 52% colours). An implicit claim was found on 65% of advertisements (27% images and 52% colours) in 2014. There are variations with some products having higher shares this year compared to the previous study (most noteworthy consumer electronics, coffee machines and clothing) while this is the other way around for other products (most noteworthy washing machines, refrigerators and rubbish bags).

The overall share of implicit claims identified by mystery shoppers was higher in the 2014 study (30% in 2020 and 46% in 2014). This may be explained by the fact that some products were assessed offline and others online, though shares were even higher for the total market average of online assessments compared to offline advertisements. Televisions had a considerably higher share in 2020 (44% compared to 3% in 2014). Washing machines had a lower share this year (13% compared to 33% in 2014). Small differences can be found for skin creams and shower heads (31% and 38% in 2020, respectively, and 36% and 40% in 2014, respectively).

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[46] Both an environmental image and colour could be recorded per product webpage or advertisement.
[47] Note that in the reported study implicit claims were only recorded if no explicit claim was found. This may explain differences to the 2014 study.

Table 18: Share of implicit environmental claims (non-food) - % of total no. assessed

	Total no. assessed	Share of implicit environmental claims	Share of implicit environmental claims - images	Share of implicit environmental claims - colours
Total	2911	45%	29%	38%
Non-food products	1484	44%	24%	38%
Consumer electronics	160	54%	38%	42%
Mobile phones	20	70%	40%	65%
Laptops	20	70%	15%	65%
Televisions	120	49%	44%	35%
Household appliances	76	21%	7%	19%
Washing machines	36	16%	5%	14%
Refrigerators	20	30%	10%	25%
Coffee machines	20	40%	20%	35%
Textiles	252	32%	15%	27%
Clothing: Sportswear women	132	30%	16%	24%
Footwear men size 42	120	34%	14%	30%
Household cleaning and storing products	316	46%	29%	45%
Washing machine detergents	280	55%	32%	53%
Rubbish bags	36	40%	31%	40%
Personal hygiene and beauty products	108	35%	20%	27%
Shampoos	36	38%	16%	31%
Skin creams	36	43%	24%	26%
Toilet paper	36	26%	21%	23%
Baby products	72	50%	19%	46%
Baby bottles	36	43%	18%	40%
Baby diapers	36	61%	19%	55%
Misc. Household	203	45%	16%	40%
Paints	120	57%	21%	52%
Windows	16	19%	6%	13%
Hardwood floors	15	25%	0%	25%
Carpets	36	37%	7%	34%
Shower heads	16	38%	19%	38%
Transport	125	52%	42%	47%
Passenger vehicles	35	40%	35%	38%
Airlines	90	64%	49%	57%
Financial services	100	59%	34%	49%
Consumer investment products	100	59%	34%	49%
Other services	72	47%	20%	40%
Hotels	36	62%	24%	52%
Household electricity services	36	31%	16%	29%

Cereals and cereal products had the highest share of implicit environmental claims (59%), followed by sugar and fats and oils (56% and 54%, respectively). At 20%, meat

was the market with the lowest share. Relevant images were found on 48% of fats and oils, 44% of sugar and 43% of cereals and cereal products. When it came to the use of blue or green colours, beverages and pre-prepared meals moved up to the top three markets, with 45% both. Cereals and cereal products remained in the top three (49%).

Lager pils is the product that most often had an implicit environmental claim web shops or advertisement (69%). This high percentage stemmed mainly from the use of blue or green colours (69%, compared to 41% of images). The reverse pattern was observed for pre-packed bread 54% images and 46% colours). Whole milk and sugar followed, with environmental claims in 64% and 63% of cases, respectively. Eco-friendly images were most frequently used on pre-packed bread, sunflower oil and orange juice (all 54%). In comparison to other food products, beef products had a considerably lower share of images, at 5%.

Table 19: Share of implicit environmental claims (food) - % of total no. assessed

	Total no. assessed	Share of implicit environmental claims	Share of implicit environmental claims - images	Share of implicit environmental claims - colours
Total	2911	45%	29%	38%
Food	1427	46%	33%	38%
Beverages	484	52%	37%	45%
Wine	110	55%	35%	39%
Lager Pils	36	75%	41%	69%
Ground coffee	192	37%	22%	28%
Bottled water	110	40%	32%	35%
Orange juice	36	54%	54%	51%
Cereals and cereal products	249	59%	43%	49%
Pre-packed bread	36	66%	54%	46%
Spaghetti pasta	177	56%	33%	49%
Rice	36	55%	43%	52%
Dairy and eggs	127	46%	26%	42%
Whole milk	91	64%	36%	58%
Eggs	36	28%	17%	26%
Fats and oils	106	54%	48%	43%
Margarine	36	61%	52%	55%
Olive oil	36	41%	38%	35%
Sunflower oil	34	59%	54%	39%
Fruits	107	27%	21%	21%
Apples	36	23%	19%	20%
Bananas	36	31%	22%	23%
Oranges	35	32%	24%	22%
Meat	72	20%	15%	20%
Poultry meat	36	28%	19%	28%
Beef	36	5%	5%	5%
Pre-prepared meals	104	49%	34%	45%
Lasagne	33	54%	38%	48%
Soup (in Tetrapak)	35	38%	36%	38%
Pizza	36	56%	29%	50%
Sugar	70	56%	44%	43%
Cane sugar	16	44%	38%	31%
Granulated white sugar	14	56%	44%	31%
Sugar	40	63%	48%	55%
Vegetables	108	49%	30%	38%
Tomatoes	36	42%	34%	35%
Canned beans	36	59%	28%	44%
Potatoes	36	37%	13%	34%

2.3.4 Share of claims per claim theme

In addition to the type of claim, the theme or category of benefits to which the explicit claim could be allocated was also specified. Mystery shoppers and advertisement analysts

were required to select at least one theme, with the option to select multiple themes. The determinant for a specific claim was whether it specified how the product/service (or its use, or its production) was beneficial for the environment. In addition to specific claim themes, they had the option of coding 'general' claims, where the benefit was unclear. The table below shows the pre-identified themes, which included those from the 2014 consumers market study on environmental claims for non-food products as well as some addition themes: reusable, safe disposal, ingredients, brand name, and a differentiation between recyclable and recycled materials (collapsed into 'recycle' in the previous study). Examples for each theme are included in the briefing documents given to mystery shoppers and advertisement analysts (see Annexes VII and VIII).

Table 20: Claim themes

Air - general air quality or volatile organic compounds (VOCs)
Biodegradable - degradable, biodegradable, compostable
Carbon/climate - climate-related claims, greenhouse gases, carbon, CO_2, carbon footprint
Cause – environment-related cause, donation to or support of an environmental organisation
Efficiency - energy efficiency or fuel efficiency
Forest - forest-related, timber
Lifecycle - lifecycle, cradle-to-grave, cradle-to-cradle, or description of impacts across a products whole cycle (manufacturing, use, etc.)
Lifespan - durability, lifetime
Materials - material or resource efficiency, renewable resources
Organic - organic
Recyclable – product/packaging
Recycled material – product/packaging
Reusable – product/packaging can be reused/refilled
Safe disposal – safe disposal due to (potentially) dangerous substances
Water - reduced water consumption, water reuse, wastewater treatment, anything water related
Ingredients – product includes claims that relate to ingredients
General - general environmental claims
Brand name – brand name suggests environmental friendliness (this theme is only applicable for textual claims, not logos/labels)

As the same explicit claim might have been recorded by more than one mystery shopper/advertisement analyst and opinions on the theme could differ between assessments, all themes that were selected for a certain claim were included in the unique claims database, i.e. it was not required that the same theme be identified by all mystery shoppers and advertisement analysts. For example, if a mystery shopper in Spain recorded the theme *carbon/climate* for the textual claim 'decreased CO_2 emissions' of the product passenger vehicles, and another mystery shopper indicated the themes *carbon/climate* and *cause* for the same claim in the product category airlines, both themes were assigned to the claim 'decreased CO_2 emissions'.

A *general* (explicit) claim was the most common theme recorded (21%), followed by claims related to *ingredients* (10%). Other themes were rarely – if ever - found, including *reusable, air* and *safe disposal*. Notable differences between food and non-food products related to the themes *efficiency* (food 1%, non-food 11%), *organic* (food 15%, non-food 2%) and *ingredients* (food 16%, non-food 5%).

Table 21: Share of explicit claims per claim theme (non-food) - % of total no. assessed

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Total	2911	21%	1%	1%	8%	2%	6%	2%	1%	2%	4%	8%	2%	2%	0%	1%	2%	10%	3%
Non-food products	1484	19%	1%	1%	7%	1%	11%	2%	1%	3%	6%	2%	2%	3%	0%	1%	3%	5%	2%
Consumer electronics	160	20%	3%	0%	3%	0%	23%	0%	0%	4%	4%	5%	6%	4%	0%	3%	4%	5%	0%
Mobile phones	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Laptops	20	5%	0%	0%	0%	0%	15%	0%	0%	5%	5%	0%	0%	5%	0%	0%	5%	0%	0%
Televisions	120	19%	3%	0%	3%	0%	31%	0%	0%	4%	3%	14%	6%	3%	0%	3%	3%	15%	0%
Household appliances	76	24%	0%	0%	0%	0%	49%	0%	1%	9%	3%	0%	0%	0%	0%	0%	18%	3%	3%
Washing machines	36	25%	0%	0%	0%	0%	46%	0%	0%	13%	3%	0%	0%	0%	0%	0%	23%	10%	3%
Refrigerators	20	40%	0%	0%	0%	0%	25%	0%	5%	15%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Coffee machines	20	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Textiles	252	2%	0%	0%	1%	0%	0%	0%	0%	0%	5%	0%	0%	4%	0%	1%	1%	0%	2%
Clothing: Sportswear women	132	3%	0%	0%	2%	0%	1%	0%	0%	0%	2%	1%	0%	7%	0%	1%	1%	0%	3%
Footwear men size 42	120	1%	0%	0%	0%	0%	0%	0%	0%	0%	8%	0%	0%	1%	0%	0%	0%	1%	0%
Household cleaning and storing products	316	27%	0%	7%	1%	1%	1%	0%	1%	3%	2%	3%	5%	8%	1%	2%	2%	12%	4%
Washing machine detergents	280	29%	0%	4%	3%	1%	3%	0%	2%	2%	4%	5%	3%	3%	0%	0%	3%	17%	5%
Rubbish bags	36	21%	0%	10%	0%	0%	0%	0%	0%	3%	0%	2%	6%	12%	2%	3%	0%	0%	5%
Personal hygiene and beauty products	108	35%	0%	6%	7%	1%	1%	8%	4%	4%	1%	9%	11%	9%	0%	0%	2%	21%	2%
Shampoos	36	22%	0%	0%	6%	0%	3%	0%	3%	3%	0%	9%	9%	12%	0%	0%	3%	16%	0%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Skin creams	36	23%	0%	0%	0%	3%	0%	0%	0%	0%	0%	17%	0%	3%	0%	0%	0%	22%	0%
Toilet paper	36	59%	0%	18%	16%	0%	0%	25%	9%	9%	3%	0%	24%	13%	0%	0%	3%	24%	6%
Baby products	72	21%	0%	0%	8%	0%	1%	8%	0%	0%	19%	0%	0%	2%	0%	2%	0%	3%	8%
Baby bottles	36	3%	0%	0%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	0%	0%	0%
Baby diapers	36	31%	0%	0%	16%	0%	3%	16%	0%	0%	21%	0%	0%	3%	0%	3%	0%	5%	16%
Misc. Household	203	10%	0%	0%	3%	0%	7%	3%	2%	4%	3%	0%	1%	1%	0%	0%	3%	4%	0%
Paints	120	13%	1%	0%	4%	0%	5%	0%	5%	8%	0%	1%	0%	0%	0%	0%	0%	4%	0%
Windows	16	6%	0%	0%	0%	0%	25%	0%	0%	0%	13%	0%	6%	0%	0%	0%	0%	0%	0%
Hardwood floors	15	25%	0%	0%	25%	0%	0%	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Carpets	36	2%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	2%	3%	0%	0%	0%	0%	0%
Shower heads	16	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	25%	0%	0%
Transport	125	13%	1%	0%	24%	1%	11%	0%	0%	3%	10%	0%	0%	0%	0%	1%	0%	0%	4%
Passenger vehicles	35	12%	0%	0%	30%	0%	20%	0%	0%	6%	18%	0%	0%	0%	0%	0%	0%	0%	8%
Airlines	90	14%	2%	0%	18%	3%	1%	0%	0%	0%	1%	0%	0%	0%	0%	1%	1%	0%	0%
Financial services	100	13%	0%	0%	8%	3%	3%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	2%	1%
Consumer investment products	100	13%	0%	0%	8%	3%	3%	1%	0%	0%	1%	0%	0%	0%	0%	0%	0%	2%	1%
Other services	72	22%	2%	0%	15%	7%	12%	3%	0%	1%	11%	0%	0%	0%	2%	0%	4%	2%	0%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Hotels	36	9%	0%	0%	5%	3%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	3%	4%	0%
Household electricity services	36	35%	4%	0%	25%	11%	25%	6%	0%	0%	21%	0%	0%	0%	3%	0%	5%	0%	0%

Note 7: Claims on televisions were logged in the themes organic and ingredients because the label Organic LED was found on the products, which was classified both as logo and textual claim.

For **non-food products**, the incidence of the different themes varied by market and product. 49% of household appliances contained an explicit environmental claim related to *efficiency*, mainly found on washing machines (46%) and refrigerators (25%) – this finding also reflects the use of the mandatory EU energy label. 19% of baby products made a claim about the *materials* used. A high share of personal hygiene and beauty products included a claim linked to *ingredients* (21%), with skin screams and toilet paper having the highest shares (22% and 24%, respectively). More than half of toilet paper products and/or their advertisements had a text or logo/label on the general theme. 15% of other services and 24% of transport products mentioned *carbon/climate*, chiefly passenger vehicles (where reference to fuel economy and CO2 emissions is actually mandatory) and household electricity services (30% and 25%, respectively). Themes were rarely identified for textiles.

After general environmental claims, *ingredients* and *organic* were the most frequently identified themes for **food products** (21%, 16% and 15%, respectively). Explicit claims related to *organic* were often made on dairy and eggs and fruits (21% and 20%, respectively) and were noticeably frequent for olive oil, tomatoes and eggs (36%, 27% and 26%, respectively). The theme *ingredients* was recorded for a high number of items/advertisements in the markets meat and pre-prepared meals (23% each). Soup and eggs had the highest shares of this theme (46% and 38%, respectively). The *brand name* suggested environmental benefits on 25% of granulated white sugar items. *Carbon/climate* was mentioned on 25% of eggs.

Table 22: Share of explicit claims per claim theme (food) - % of total no. assessed

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Total	2911	21%	1%	1%	8%	2%	6%	2%	1%	2%	4%	8%	2%	2%	0%	0%	2%	10%	3%
Food	1427	24%	0%	0%	10%	2%	1%	2%	1%	1%	1%	15%	2%	1%	0%	0%	1%	16%	3%
Beverages	484	22%	0%	1%	9%	2%	0%	1%	0%	1%	2%	12%	2%	1%	0%	0%	9%	13%	2%
Wine	110	17%	0%	0%	6%	2%	0%	0%	2%	0%	3%	13%	1%	2%	0%	0%	0%	11%	1%
Lager Pils	36	6%	0%	3%	3%	0%	0%	0%	0%	0%	3%	3%	3%	0%	0%	0%	0%	0%	0%
Ground coffee	192	26%	0%	0%	11%	8%	0%	5%	0%	4%	2%	8%	1%	1%	0%	0%	4%	7%	1%
Bottled water	110	33%	0%	0%	10%	0%	0%	1%	0%	0%	1%	8%	6%	0%	0%	0%	36%	26%	3%
Orange juice	36	30%	0%	0%	16%	0%	0%	0%	0%	0%	3%	25%	0%	0%	0%	0%	5%	23%	3%
Cereals and cereal products	249	8%	1%	0%	12%	0%	0%	0%	1%	1%	3%	17%	1%	0%	0%	0%	0%	9%	2%
Pre-packed bread	36	3%	3%	0%	3%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	8%	0%
Spaghetti pasta	177	7%	2%	0%	14%	0%	0%	0%	4%	4%	4%	25%	0%	0%	0%	0%	0%	16%	2%
Rice	36	15%	0%	0%	19%	0%	0%	0%	0%	0%	3%	25%	3%	0%	0%	0%	0%	3%	3%
Dairy and eggs	127	34%	0%	0%	21%	0%	2%	11%	0%	1%	4%	21%	4%	4%	0%	0%	1%	20%	1%
Whole milk	91	13%	0%	0%	18%	0%	1%	12%	1%	1%	7%	17%	3%	2%	0%	0%	1%	2%	0%
Eggs	36	54%	0%	0%	25%	0%	3%	9%	0%	0%	0%	26%	6%	6%	0%	0%	0%	38%	3%
Fats and oils	106	24%	0%	0%	12%	2%	0%	1%	1%	2%	1%	18%	4%	0%	0%	0%	0%	19%	2%
Margarine	36	18%	0%	0%	8%	0%	0%	0%	0%	0%	3%	8%	3%	0%	0%	0%	0%	17%	0%
Olive oil	36	27%	0%	0%	22%	0%	0%	0%	3%	6%	0%	36%	0%	0%	0%	0%	0%	16%	6%
Sunflower oil	34	29%	0%	0%	7%	5%	0%	3%	0%	0%	0%	12%	9%	0%	0%	0%	0%	24%	0%
Fruits	107	36%	0%	0%	5%	2%	4%	0%	1%	0%	0%	20%	1%	1%	0%	0%	1%	7%	4%
Apples	36	34%	0%	0%	6%	0%	6%	0%	0%	0%	0%	13%	0%	0%	0%	0%	0%	0%	0%
Bananas	36	31%	0%	0%	3%	6%	0%	0%	0%	0%	0%	16%	0%	0%	0%	0%	0%	0%	6%
Oranges	35	37%	0%	0%	6%	0%	4%	0%	2%	0%	0%	27%	2%	2%	0%	0%	3%	15%	4%
Meat	72	32%	0%	0%	8%	0%	0%	0%	3%	3%	0%	8%	3%	0%	0%	0%	0%	23%	5%
Poultry meat	36	21%	0%	0%	3%	0%	0%	0%	0%	0%	0%	5%	3%	0%	0%	0%	0%	23%	5%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Beef	36	49%	0%	0%	12%	0%	0%	0%	9%	6%	0%	9%	3%	0%	0%	0%	0%	35%	0%
Pre-prepared meals	104	11%	0%	1%	4%	0%	0%	1%	0%	0%	2%	11%	0%	0%	0%	0%	1%	23%	0%
Lasagne	33	20%	0%	3%	13%	0%	0%	3%	0%	0%	5%	11%	0%	0%	0%	0%	3%	23%	0%
Soup (in Tetrapak)	35	12%	0%	0%	0%	0%	0%	0%	0%	0%	0%	22%	0%	0%	0%	0%	0%	46%	0%
Pizza	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Sugar	70	28%	0%	0%	9%	9%	1%	3%	1%	0%	0%	14%	2%	0%	0%	2%	0%	9%	10%
Cane sugar	16	38%	0%	0%	13%	31%	0%	0%	0%	0%	0%	19%	0%	0%	0%	6%	0%	13%	6%
Granulated white sugar	14	25%	0%	0%	13%	0%	0%	13%	0%	0%	0%	6%	6%	0%	0%	0%	0%	0%	25%
Sugar	40	25%	0%	0%	5%	3%	3%	0%	3%	0%	0%	15%	0%	0%	0%	0%	0%	13%	5%
Vegetables	108	21%	1%	0%	7%	1%	0%	0%	1%	0%	0%	13%	1%	0%	0%	0%	0%	17%	3%
Tomatoes	36	30%	0%	0%	16%	3%	0%	0%	4%	0%	0%	22%	3%	0%	0%	0%	2%	28%	8%
Canned beans	36	26%	3%	0%	9%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	14%	3%
Potatoes	36	18%	0%	0%	0%	0%	0%	0%	0%	0%	0%	13%	0%	0%	1%	0%	0%	17%	0%

2.3.4.1 Share of environmental logos/labels per claim theme

The theme *general* contained the highest share of explicit environmental claims as logos/labels (9%) because the message conveyed could not be assigned to any of the 16 specified themes. 5% of all products assessed made a claim that fell within the theme *carbon/climate*. 4% referred to *ingredients* and *organic*.

Table 23: Share of logos/labels per claim theme (non-food) - % of total no. assessed

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients
Total	2911	9%	0%	0%	5%	1%	1%	1%	1%	1%	1%	4%	1%	0%	0%	0%	0%	4%
Non-food products	1484	5%	0%	1%	2%	0%	3%	1%	1%	1%	2%	1%	0%	1%	0%	0%	0%	2%
Consumer electronics	160	0%	0%	0%	0%	0%	10%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	3%
Mobile phones	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Laptops	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Televisions	120	0%	0%	0%	0%	0%	16%	0%	0%	0%	0%	10%	0%	0%	0%	0%	0%	10%
Household appliances	76	2%	0%	0%	0%	0%	19%	0%	0%	4%	0%	0%	0%	0%	0%	0%	0%	0%
Washing machines	36	0%	0%	0%	0%	0%	19%	0%	0%	10%	0%	0%	0%	0%	0%	0%	0%	0%
Refrigerators	20	5%	0%	0%	0%	0%	0%	0%	0%	5%	0%	0%	0%	0%	0%	0%	0%	0%
Coffee machines	20	5%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Textiles	252	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	1%	1%	0%
Clothing: Sportswear women	132	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	1%	1%	0%
Footwear men size 42	120	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
Household cleaning and storing products	316	13%	0%	1%	1%	0%	0%	0%	1%	1%	1%	1%	1%	2%	0%	0%	2%	4%
Washing machine detergents	280	19%	0%	1%	2%	1%	0%	0%	1%	1%	1%	1%	1%	1%	0%	0%	2%	4%
Rubbish bags	36	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%
Personal hygiene and beauty products	108	15%	0%	4%	6%	0%	0%	4%	4%	3%	0%	3%	4%	3%	0%	0%	0%	11%
Shampoos	36	14%	0%	0%	3%	0%	0%	0%	3%	3%	0%	0%	6%	0%	0%	0%	0%	8%
Skin creams	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	8%	0%	0%	0%	0%	0%	0%
Toilet paper	36	30%	0%	13%	16%	0%	0%	13%	9%	6%	0%	0%	6%	9%	0%	0%	0%	24%
Baby products	72	18%	0%	0%	8%	0%	1%	8%	0%	0%	13%	0%	0%	0%	0%	0%	0%	0%
Baby bottles	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	0%
Baby diapers	36	28%	0%	0%	16%	0%	3%	16%	0%	0%	16%	0%	0%	0%	0%	0%	0%	0%
Misc. Household	203	0%	0%	0%	1%	0%	0%	0%	1%	1%	1%	0%	0%	0%	0%	0%	0%	0%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients
Paints	120	1%	0%	0%	4%	0%	0%	0%	4%	4%	0%	0%	0%	0%	0%	0%	0%	0%
Windows	16	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Hardwood floors	15	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Carpets	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	0%
Shower heads	16	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Transport	125	2%	0%	0%	1%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%
Passenger vehicles	35	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	0%	0%
Airlines	90	4%	0%	0%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%
Financial services	100	1%	0%	0%	2%	2%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Consumer investment products	100	1%	0%	0%	2%	2%	0%	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Other services	72	2%	2%	0%	6%	0%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	1%	0%
Hotels	36	0%	0%	0%	3%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	3%	0%
Household electricity services	36	3%	4%	0%	9%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%

Note 8: Claims on televisions were logged in the themes organic and ingredients because the label Organic LED was found on the products, which was classified both as logo and textual claim.

Within the non-food category (see table above), the highest incidences within the *general* theme were found for toilet paper and baby diapers (30% and 28%, respectively). However, these products were also represented in other themes, albeit with a lower percentage (for example, toilet paper and baby diapers in *carbon/climate,* each with 16%, or *forest*, with 13% and 16%, respectively). 16% of baby diapers also mentioned the use of *materials* or resource efficiency or renewable resources. *Efficiency* was used for 19% of items assessed for washing machines and for 16% of televisions.

Among food products (see table below), 39% of eggs and 31% of beef and cane sugar contained a *general environmental logo/label* that could not be categorised as one of the 16 defined themes. Climate-related claims or a reference to greenhouse gases, carbon, CO_2 or carbon footprint (*carbon/climate*) were shown on 25% of eggs and 21% of olive oils, followed by rice (19%). Cane sugar most often mentioned an environment-related *cause* (or a donation or support of an environmental organisation). 26% of products assessed in the category olive oil made some kind of *organic* claim with their logo/label[48]. A considerable number of beef products (35%) indicated environmental benefits of the *ingredients* used. A smaller number of eggs made this statement (28%).

Table 24: Share of logos/labels per claim theme (food) - % of total no. assessed

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48 The EU organic logo was identified on only 3% of all products assessed. As per Article 23(1) of Regulation (EC) No 834/2007, it is compulsory to include the EU organic logo if a product is claiming to be 'organic'. The study findings show that this does not seem to be the practice: 4% of all assessed logos/labels made some kind of organic claim, yet only 3% contained the EU organic logo.

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients
Total	2911	9%	0%	0%	5%	1%	1%	1%	1%	1%	1%	4%	1%	0%	0%	0%	0%	4%
Food	1427	12%	0%	0%	8%	2%	0%	2%	1%	1%	1%	8%	1%	0%	0%	0%	0%	7%
Beverages	484	7%	0%	0%	7%	2%	0%	1%	0%	1%	0%	6%	2%	0%	0%	0%	1%	2%
Wine	110	5%	0%	0%	3%	1%	0%	0%	0%	0%	1%	7%	0%	1%	0%	0%	0%	5%
Lager Pils	36	3%	0%	0%	3%	0%	0%	0%	0%	0%	0%	3%	3%	0%	0%	0%	0%	0%
Ground coffee	192	12%	0%	0%	11%	7%	0%	4%	0%	4%	0%	6%	0%	0%	0%	0%	4%	3%
Bottled water	110	13%	0%	0%	5%	0%	0%	1%	0%	0%	0%	0%	4%	0%	0%	0%	1%	2%
Orange juice	36	0%	0%	0%	16%	0%	0%	0%	0%	0%	0%	16%	0%	0%	0%	0%	0%	0%
Cereals and cereal products	249	7%	1%	0%	12%	0%	0%	0%	1%	1%	2%	11%	1%	0%	0%	0%	0%	3%
Pre-packed bread	36	3%	3%	0%	3%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	5%
Spaghetti pasta	177	4%	0%	0%	14%	0%	0%	0%	4%	4%	4%	13%	0%	0%	0%	0%	0%	3%
Rice	36	15%	0%	0%	19%	0%	0%	0%	0%	0%	0%	19%	3%	0%	0%	0%	0%	3%
Dairy and eggs	127	22%	0%	0%	19%	0%	0%	8%	0%	1%	2%	12%	2%	0%	0%	0%	1%	14%
Whole milk	91	5%	0%	0%	13%	0%	0%	6%	0%	1%	3%	8%	0%	0%	0%	0%	1%	0%
Eggs	36	39%	0%	0%	25%	0%	0%	9%	0%	0%	0%	16%	3%	0%	0%	0%	0%	28%
Fats and oils	106	5%	0%	0%	10%	2%	0%	1%	1%	1%	0%	14%	0%	0%	0%	0%	0%	3%
Margarine	36	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	0%
Olive oil	36	9%	0%	0%	21%	0%	0%	0%	3%	3%	0%	26%	0%	0%	0%	0%	0%	3%
Sunflower oil	34	8%	0%	0%	7%	5%	0%	3%	0%	0%	0%	9%	0%	0%	0%	0%	0%	5%
Fruits	107	13%	0%	0%	4%	2%	0%	0%	0%	0%	0%	8%	0%	0%	0%	0%	0%	3%
Apples	36	10%	0%	0%	3%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%
Bananas	36	9%	0%	0%	3%	6%	0%	0%	0%	0%	0%	12%	0%	0%	0%	0%	0%	0%
Oranges	35	18%	0%	0%	6%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	7%
Meat	72	15%	0%	0%	5%	0%	0%	0%	3%	3%	0%	2%	3%	0%	0%	0%	0%	13%
Poultry meat	36	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	13%
Beef	36	31%	0%	0%	9%	0%	0%	0%	6%	6%	0%	3%	3%	0%	0%	0%	0%	35%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients
Pre-prepared meals	104	6%	0%	1%	4%	0%	0%	1%	0%	0%	2%	4%	0%	0%	0%	0%	1%	8%
Lasagne	33	15%	0%	3%	13%	0%	0%	3%	0%	0%	5%	8%	0%	0%	0%	0%	3%	15%
Soup (in Tetrapak)	35	4%	0%	0%	0%	0%	0%	0%	0%	0%	0%	4%	0%	0%	0%	0%	0%	8%
Pizza	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Sugar	70	19%	0%	0%	8%	9%	0%	3%	1%	0%	0%	8%	2%	0%	0%	2%	0%	6%
Cane sugar	16	31%	0%	0%	13%	31%	0%	0%	0%	0%	0%	19%	0%	0%	0%	6%	0%	0%
Granulated white sugar	14	25%	0%	0%	13%	0%	0%	13%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%
Sugar	40	10%	0%	0%	3%	3%	0%	0%	3%	0%	0%	8%	0%	0%	0%	0%	0%	13%
Vegetables	108	13%	0%	0%	6%	1%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	9%
Tomatoes	36	21%	0%	0%	13%	3%	0%	0%	0%	0%	0%	16%	0%	0%	0%	0%	0%	20%
Canned beans	36	9%	0%	0%	6%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	0%
Potatoes	36	17%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	17%

2.3.4.2 Share of textual claims per claim theme

General textual environmental claims were most prevalent (16%), followed by *ingredients* (8%) and *organic* (7%). Comparing non-food and food products, the theme *organic* was more often used for food products (13%, compared to 1% of non-food products). *Efficiency*, on the other hand, was more frequently found on non-food products (10%, compared to 1% on food products).

Table 25: Share of textual claims per claim theme (non-food) - % of total no. assessed

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Total	2911	16%	0%	0%	4%	1%	5%	1%	0%	1%	3%	7%	2%	1%	0%	0%	2%	8%	3%
Non-food products	1484	15%	0%	1%	5%	1%	10%	1%	0%	2%	5%	1%	2%	2%	0%	1%	3%	4%	2%
Consumer electronics	160	20%	3%	0%	3%	0%	18%	0%	0%	4%	4%	2%	6%	4%	0%	3%	4%	3%	0%
Mobile phones	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Laptops	20	5%	0%	0%	0%	0%	15%	0%	0%	5%	5%	0%	0%	5%	0%	0%	5%	0%	0%
Televisions	120	19%	3%	0%	3%	0%	21%	0%	0%	4%	3%	7%	6%	3%	0%	3%	3%	8%	0%
Household appliances	76	23%	0%	0%	0%	0%	49%	0%	1%	5%	3%	0%	0%	0%	0%	0%	18%	3%	3%
Washing machines	36	25%	0%	0%	0%	0%	46%	0%	0%	3%	3%	0%	0%	0%	0%	0%	23%	10%	3%
Refrigerators	20	35%	0%	0%	0%	0%	25%	0%	5%	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Coffee machines	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Textiles	252	1%	0%	0%	1%	0%	0%	0%	0%	0%	5%	0%	0%	4%	0%	1%	1%	0%	2%
Clothing: Sportswear women	132	3%	0%	0%	2%	0%	1%	0%	0%	0%	2%	1%	0%	7%	0%	1%	1%	0%	3%
Footwear men size 42	120	0%	0%	0%	0%	0%	0%	0%	0%	0%	8%	0%	0%	1%	0%	0%	0%	0%	0%
Household cleaning and storing products	316	22%	0%	6%	1%	0%	1%	0%	1%	2%	2%	3%	4%	8%	1%	2%	2%	12%	4%
Washing machine detergents	280	22%	0%	3%	1%	1%	3%	0%	2%	2%	4%	5%	2%	3%	0%	0%	2%	16%	5%
Rubbish bags	36	18%	0%	10%	0%	0%	0%	0%	0%	3%	0%	2%	6%	12%	2%	3%	0%	0%	5%
Personal hygiene and beauty products	108	23%	0%	2%	1%	1%	1%	4%	0%	1%	1%	8%	7%	6%	0%	0%	2%	14%	2%
Shampoos	36	13%	0%	0%	3%	0%	3%	0%	0%	0%	0%	9%	3%	12%	0%	0%	3%	11%	0%
Skin creams	36	23%	0%	0%	0%	3%	0%	0%	0%	0%	0%	14%	0%	3%	0%	0%	0%	22%	0%
Toilet paper	36	32%	0%	6%	0%	0%	0%	13%	0%	3%	3%	0%	18%	3%	0%	0%	3%	9%	6%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Baby products	72	9%	0%	0%	0%	0%	0%	0%	0%	0%	9%	0%	0%	2%	0%	2%	0%	3%	8%
Baby bottles	36	3%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	0%	0%	0%
Baby diapers	36	16%	0%	0%	0%	0%	0%	0%	0%	0%	11%	0%	0%	3%	0%	3%	0%	5%	16%
Misc. Household	203	10%	0%	0%	3%	0%	7%	3%	1%	3%	3%	0%	1%	1%	0%	0%	3%	4%	0%
Paints	120	12%	1%	0%	0%	0%	5%	0%	1%	3%	0%	1%	0%	0%	0%	0%	0%	4%	0%
Windows	16	6%	0%	0%	0%	0%	25%	0%	0%	0%	13%	0%	6%	0%	0%	0%	0%	0%	0%
Hardwood floors	15	25%	0%	0%	25%	0%	0%	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Carpets	36	2%	0%	0%	0%	0%	0%	0%	0%	0%	3%	0%	2%	3%	0%	0%	0%	0%	0%
Shower heads	16	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	25%	0%	0%
Transport	125	12%	1%	0%	24%	1%	11%	0%	0%	2%	10%	0%	0%	0%	0%	1%	0%	0%	4%
Passenger vehicles	35	12%	0%	0%	30%	0%	20%	0%	0%	3%	18%	0%	0%	0%	0%	0%	0%	0%	8%
Airlines	90	13%	2%	0%	18%	3%	1%	0%	0%	0%	1%	0%	0%	0%	0%	1%	0%	0%	0%
Financial services	100	12%	0%	0%	6%	2%	3%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	2%	1%
Consumer investment products	100	12%	0%	0%	6%	2%	3%	0%	0%	0%	1%	0%	0%	0%	0%	0%	0%	2%	1%
Other services	72	22%	0%	0%	12%	7%	12%	3%	0%	0%	11%	0%	0%	0%	2%	0%	3%	2%	0%
Hotels	36	9%	0%	0%	3%	3%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	4%	0%
Household electricity services	36	35%	0%	0%	21%	11%	25%	6%	0%	0%	21%	0%	0%	0%	3%	0%	5%	0%	0%

Note 9: Claims on televisions were logged in the themes organic and ingredients because the label Organic LED was found on the products, which was classified both as logo and textual claim.

Within the non-food category, 10% of rubbish bags and 6% of toilet papers displayed a textual claim related to *biodegradability*. *Carbon/climate*-related textual claims were common on passenger vehicles (where reference to fuel economy and CO2 emissions does is actually)and hardwood floors (30% and 25%, respectively). Unsurprisingly, *efficiency* was most often mentioned on household appliances, such as washing machines and refrigerators (46% and 25%), but also on windows and household electricity services (25% each). Compared to other non-food products, skin creams made the most references to *organic* (14%) and *ingredients* (22%). 18% of toilet paper cited *recyclability*.

Carbon/climate-related textual claims were most prevalent on granulated white sugar and tomatoes (13% and 12%, respectively). 13% of granulated white sugar and 9% of whole milks made a textual claim related to *forest*. The theme *organic* – which was second only to *general* for frequency of use on food products – was used particularly often for olive oil, oranges and rice (34%, 27% and 25%, respectively). The *brand names* of granulated white sugar most frequently related to eco-friendliness (25%).

Table 26: Share of textual claims per claim theme (food) - % of total no. assessed

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Total	2911	16%	0%	0%	4%	1%	5%	1%	0%	1%	3%	7%	2%	1%	0%	0%	2%	8%	3%
Food	1427	16%	0%	0%	3%	0%	1%	1%	0%	0%	1%	13%	1%	1%	0%	0%	1%	11%	3%
Beverages	484	17%	0%	1%	3%	0%	0%	0%	0%	0%	2%	8%	1%	0%	0%	0%	8%	13%	2%
Wine	110	11%	0%	0%	3%	1%	0%	0%	2%	0%	2%	11%	1%	1%	0%	0%	0%	9%	1%
Lager Pils	36	3%	0%	3%	0%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	0%	0%
Ground coffee	192	19%	0%	0%	5%	0%	0%	1%	0%	1%	2%	6%	1%	0%	0%	0%	1%	4%	1%
Bottled water	110	23%	0%	0%	6%	0%	0%	0%	0%	0%	1%	8%	2%	0%	0%	0%	36%	26%	3%
Orange juice	36	32%	0%	0%	0%	0%	0%	0%	0%	0%	3%	16%	0%	0%	0%	0%	5%	24%	3%
Cereals and cereal products	249	3%	1%	0%	1%	0%	0%	0%	0%	0%	2%	16%	1%	0%	0%	0%	0%	8%	2%
Pre-packed bread	36	3%	3%	0%	3%	0%	0%	0%	0%	0%	3%	0%	0%	0%	0%	0%	0%	8%	0%
Spaghetti pasta	177	5%	2%	0%	1%	0%	0%	0%	0%	0%	0%	22%	0%	0%	0%	0%	0%	16%	2%
Rice	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	3%	25%	3%	0%	0%	0%	0%	0%	3%
Dairy and eggs	127	18%	0%	0%	7%	0%	2%	5%	0%	0%	2%	19%	3%	4%	0%	0%	0%	8%	1%
Whole milk	91	10%	0%	0%	11%	0%	1%	9%	1%	0%	4%	17%	3%	2%	0%	0%	0%	2%	0%
Eggs	36	26%	0%	0%	3%	0%	3%	0%	0%	0%	0%	21%	3%	6%	0%	0%	0%	15%	3%
Fats and oils	106	22%	0%	0%	1%	2%	0%	0%	0%	1%	1%	18%	4%	0%	0%	0%	0%	19%	2%
Margarine	36	18%	0%	0%	5%	0%	0%	0%	0%	0%	3%	8%	3%	0%	0%	0%	0%	17%	0%
Olive oil	36	21%	0%	0%	0%	0%	0%	0%	0%	3%	0%	34%	0%	0%	0%	0%	0%	16%	6%
Sunflower oil	34	29%	0%	0%	0%	5%	0%	0%	0%	0%	0%	12%	9%	0%	0%	0%	0%	24%	0%
Fruits	107	28%	0%	0%	1%	0%	4%	0%	1%	0%	0%	18%	1%	1%	0%	0%	1%	6%	4%
Apples	36	28%	0%	0%	3%	0%	6%	0%	0%	0%	0%	13%	0%	0%	0%	0%	0%	0%	0%
Bananas	36	25%	0%	0%	0%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	0%	6%
Oranges	35	23%	0%	0%	0%	0%	4%	0%	2%	0%	0%	27%	2%	2%	0%	0%	3%	13%	4%
Meat	72	18%	0%	0%	3%	0%	0%	0%	0%	0%	0%	7%	2%	0%	0%	0%	0%	10%	5%
Poultry meat	36	11%	0%	0%	3%	0%	0%	0%	0%	0%	0%	5%	3%	0%	0%	0%	0%	10%	5%
Beef	36	24%	0%	0%	3%	0%	0%	0%	3%	0%	0%	6%	0%	0%	0%	0%	0%	3%	0%

	Total no. assessed	General	Air	Biodegradable	Carbon / Climate	Cause	Efficiency	Forest	Life Cycle	Lifespan	Materials	Organic	Recyclable	Recycled material	Reusable	Safe disposal	Water	Ingredients	Brand name
Pre-prepared meals	104	7%	0%	0%	0%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	21%	0%
Lasagne	33	10%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	18%	0%
Soup (in Tetrapak)	35	12%	0%	0%	0%	0%	0%	0%	0%	0%	0%	22%	0%	0%	0%	0%	0%	46%	0%
Pizza	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Sugar	70	24%	0%	0%	4%	1%	1%	3%	0%	0%	0%	9%	0%	0%	0%	0%	0%	6%	10%
Cane sugar	16	31%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%	0%	0%	0%	0%	0%	13%	6%
Granulated white sugar	14	25%	0%	0%	13%	0%	0%	13%	0%	0%	0%	6%	0%	0%	0%	0%	0%	0%	25%
Sugar	40	20%	0%	0%	3%	3%	3%	0%	0%	0%	0%	13%	0%	0%	0%	0%	0%	5%	5%
Vegetables	108	11%	1%	0%	4%	0%	0%	0%	1%	0%	0%	12%	1%	0%	0%	0%	0%	11%	3%
Tomatoes	36	19%	0%	0%	12%	0%	0%	0%	4%	0%	0%	20%	3%	0%	0%	0%	2%	19%	8%
Canned beans	36	17%	3%	0%	3%	0%	0%	0%	0%	0%	0%	9%	0%	0%	0%	0%	0%	14%	3%
Potatoes	36	1%	0%	0%	0%	0%	0%	0%	0%	0%	0%	12%	0%	0%	1%	0%	0%	0%	0%

2.3.5 Share of potentially misleading explicit claims

This section will describe the share of potentially misleading environmental claims out of all product/service webpages and advertisements assessed. It will provide an indication of how many potentially misleading claims consumers encounter when engaging with different products/services and markets[49].

Mystery shoppers and advertisement analysts[50] were asked four questions that served as indicators to assess the extent to which explicit claims complied with the main principles of the UCPD[51], as applied to environmental claims. More specifically, the four indicators were:

- The claim is **clear** in disclosing the product's environmental benefits and impacts;

  ➔ *To what extent is the claim clear in disclosing the product's environmental benefits and impacts?*
      1. *Extremely clear*
      2. *Very clear*
      3. *Moderately clear*
      4. *Slightly clear*
      5. *Not at all clear*

- The claim is **unambiguous**;

  ➔ *To what extent is the claim ambiguous to you?*
      1. *Extremely ambiguous*
      2. *Very ambiguous*
      3. *Moderately ambiguous*
      4. *Slightly ambiguous*
      5. *Not at all ambiguous*

- The claim appears to be **accurate**;

  ➔ *Does the claim appear to be accurate to you? That is, based on the information provided in the claim, do you think the claim is factual and truthful?*
      1. *Yes*
      2. *No*
      3. *Don't know*

- The claim is **verifiable**;

  ➔ *To what extent is the claim verifiable? That is, how easy do you think it is for*

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[49] This is based on the assumption that the sample was representative.

[50] The tabulations of potentially misleading claims only include explicit claims. The rationale was that colours or images (without an explicit claim) cannot easily be categorised as misleading. In addition, the questions that were asked were not applicable to implicit claims (i.e. the degree to which the claim was clear, ambiguous, accurate and verifiable).

[51] Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to consumer commercial practices in the internal market.

you to verify the truth of this claim?
   1. *Extremely easy*
   2. *Very easy*
   3. *Moderately easy*
   4. *Slightly easy*
   5. *Not at all easy*

If mystery shoppers or advertisement analysts experienced issues on at least one of these indicators, the claim was considered as potentially misleading.[52]

As the assessments were subjective, the ratings of mystery shoppers/advertisement analysts on the degree to which a claim was clear, ambiguous, accurate and verifiable might have differed. It was also possible that products or services were presented differently across countries, varying the information shown for the product, impacting the assessment. It was therefore decided to adopt the rating that the majority of mystery shoppers/advertisement analysts had made for the same claim, i.e. the modus or mode was calculated (see example 1 below). If ratings were different and no majority was identifiable, the lowest score was taken (see example 2 below). This procedure was applied to approximately 3% of assessments.

Example 1:

Mystery shopping, product washing machine detergent, country ES: AISE logo, score 1 on Q13

Mystery shopping, product shampoo, country FR: AISE logo, score 5 on Q13

Mystery shopping, product shampoo, country PL: AISE logo, score 1 on Q13

➔   AISE logo = score 1 on Q13

Example 2:

Mystery shopping, product washing machine detergent, country ES: AISE logo, score 1 on Q13

Mystery shopping, product shampoo, country FR: AISE logo, score 5 on Q13

Mystery shopping, product shampoo, country PL: AISE logo, score 4 on Q13

➔   AISE logo = score 1 on Q13

Figures in this section express the percentage of all product/service webpages and advertisements that were evaluated, not only those identified as explicit claims. To

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[52] Answer options for questions 1, 2 and 4 were shown on a 5-point Likert scale. Two answer options were taken into account to determine that a claim was potentially misleading: Question 1: 4. Slightly clear; 5. Not at all clear; question 2: 1. Extremely ambiguous; 2. Very ambiguous; question 4: 4. Slightly easy; 5. Not at all easy. Question 3 was asked with the answer options 'yes', 'no and 'I do not know', whereby 'no' was counted as indicating a misleading claim.

ensure consistency, figures are always shown as the percentage of the total number of assessments. This is particularly important in comparing the tables here to those in Section 2.3.2:

1. Example: 39% of all televisions contained an explicit environmental claim. That is 47 out of 120. In comparison, 20% displayed a potentially misleading claim, i.e. 24 televisions out of 120, and about half of all with an explicit claim.
2. Example: 192 ground coffee items were assessed, 64 with an explicit environmental claim (33%). 42 of the 192 items (22%) showed a claim perceived as misleading (i.e. two out of three with an explicit claim).

It is worth remembering that products/services could have more than one explicit claim, i.e. they may have multiple instances of text and/or logo claims, but each product/service is included only once in the explicit environmental claims total.

Overall, **23%** of assessed product/service webpages and advertisements contained at least one **potentially misleading claim**. This is in comparison to 35% for which an explicit claim was recorded (see section 2.3.2), implying that more than half of assessed products/services webpages and advertisements containing an explicit claim showed a potentially misleading statement. Mystery shoppers and advertisement analysts flagged a **higher share of misleading text claims than logos/labels** (21% vs 5%), but overall text was also more often recorded than logos/labels (30% and 16%, respectively, see section 2.3.2)Just over one out of five (21%) of the assessed product/service webpages and advertisements contained an 'other' categorised claim that is considered potentially misleading. Finally, misleading statements were found roughly to the same extent on food and non-food products/services (25% and 21%, respectively).

As such, when comparing the shares of potentially misleading claims with the share of explicit environmental claims (see section 2.3.2), it seems that potentially misleading claims are most prevalent among text claims and other claims.

Table 27: Share of potentially misleading claims (non-food) - % of total no. assessed

	Total no. assessed	Potentially misleading...													
		...explicit environmental claims	...mandatory schemes	...EU schemes	...national or regional schemes	...other claims	...explicit environmental claims –	...mandatory schemes – logos/labels	...EU schemes – logos/labels	...national or regional schemes – logos/labels	...other claims – logos/labels	...explicit environmental claims - text	...mandatory schemes - text	...EU schemes - text	...national or regional schemes - text
Total	2911	23%	2%	0%	0%	21%	5%	0%	0%	0%	5%	21%	2%	0%	0%
Non-food products	1484	21%	3%	0%	0%	19%	3%	0%	0%	0%	3%	19%	3%	0%	0%
Consumer electronics	160	22%	0%	0%	0%	21%	0%	0%	0%	0%	0%	22%	0%	0%	0%
Mobile phones	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Laptops	20	15%	0%	0%	0%	15%	0%	0%	0%	0%	0%	15%	0%	0%	0%
Televisions	120	20%	1%	0%	0%	19%	0%	0%	0%	0%	0%	20%	1%	0%	0%
Household appliances	76	30%	16%	0%	0%	21%	3%	0%	0%	0%	3%	27%	16%	0%	0%
Washing machines	36	27%	16%	0%	0%	18%	5%	0%	0%	0%	5%	22%	16%	0%	0%
Refrigerators	20	40%	0%	0%	0%	40%	10%	0%	0%	0%	10%	30%	0%	0%	0%
Coffee machines	20	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Textiles	252	10%	6%	0%	0%	4%	0%	0%	0%	0%	0%	10%	6%	0%	0%
Clothing: Sportswear women	132	12%	5%	0%	0%	8%	0%	0%	0%	0%	0%	12%	5%	0%	0%
Footwear men size 42	120	7%	7%	0%	0%	0%	0%	0%	0%	0%	0%	7%	7%	0%	0%
Household cleaning and storing products	316	22%	0%	0%	0%	22%	2%	0%	0%	0%	2%	21%	0%	0%	0%
Washing machine detergents	280	17%	0%	0%	0%	17%	3%	0%	0%	0%	3%	16%	0%	0%	0%
Rubbish bags	36	24%	0%	0%	0%	24%	0%	0%	0%	0%	0%	24%	0%	0%	0%

Personal hygiene and beauty products	108	34%	0%	0%	0%	34%	14%	0%	0%	0%	14%	26%	0%	0%	0%
Shampoos	36	29%	0%	0%	0%	29%	12%	0%	0%	0%	12%	24%	0%	0%	0%
Skin creams	36	28%	0%	0%	0%	28%	5%	0%	0%	0%	5%	23%	0%	0%	0%
Toilet paper	36	45%	0%	0%	0%	45%	25%	0%	0%	0%	25%	32%	0%	0%	0%
Baby products	72	19%	0%	0%	0%	19%	4%	0%	0%	0%	4%	18%	0%	0%	0%
Baby bottles	36	12%	0%	0%	0%	12%	3%	0%	0%	0%	3%	9%	0%	0%	0%
Baby diapers	36	26%	0%	0%	0%	26%	6%	0%	0%	0%	6%	26%	0%	0%	0%
Misc. Household	203	18%	0%	1%	0%	17%	1%	0%	0%	0%	1%	18%	0%	1%	0%
Paints	120	14%	0%	3%	0%	11%	0%	0%	0%	0%	0%	14%	0%	3%	0%
Windows	16	25%	0%	0%	0%	25%	0%	0%	0%	0%	0%	25%	0%	0%	0%
Hardwood floors	15	50%	0%	0%	0%	50%	0%	0%	0%	0%	0%	50%	0%	0%	0%
Carpets	36	5%	0%	0%	0%	5%	3%	0%	0%	0%	3%	5%	0%	0%	0%
Shower heads	16	19%	0%	0%	0%	19%	0%	0%	0%	0%	0%	19%	0%	0%	0%
Transport	125	23%	6%	0%	0%	18%	0%	0%	0%	0%	0%	22%	6%	0%	0%
Passenger vehicles	35	25%	13%	0%	0%	16%	0%	0%	0%	0%	0%	25%	13%	0%	0%
Airlines	90	20%	0%	0%	0%	20%	1%	0%	0%	0%	1%	19%	0%	0%	0%
Financial services	100	11%	0%	0%	0%	11%	0%	0%	0%	0%	0%	11%	0%	0%	0%
Consumer investment products	100	11%	0%	0%	0%	11%	0%	0%	0%	0%	0%	11%	0%	0%	0%
Other services	72	21%	0%	0%	0%	21%	5%	0%	0%	0%	5%	19%	0%	0%	0%
Hotels	36	7%	0%	0%	0%	7%	0%	0%	0%	0%	0%	7%	0%	0%	0%
Household electricity services	36	36%	0%	0%	0%	36%	9%	0%	0%	0%	9%	32%	0%	0%	0%

Note 10: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

Since **mandatory claims** are understood as legal requirements, it is surprising that evaluators still perceived a claim falling into this category as misleading (2% of all 2,911 products and services assessed). The shares are particularly high in the categories washing machines, passenger vehicles and bananas (16%, 13% and 13%, respectively). In contrast, fewer **voluntary ecolabelling schemes established at EU level and by national or regional public entities** that did not appear to comply with the main principles of the UCPD were found overall, and also on fewer products/services. In fact, no voluntary nationally or regionally established ecolabelling scheme was flagged as potentially misleading in this exercise.

Uncategorised 'other' claims that were either not clear, unambiguous, accurate and/or verifiable were identified on about half of all hardwood floors, cane sugar items and bottled waters. In the case of hardwood floors, these were all 'other' textual statements. Potentially misleading uncategorised logos or labels were most often encountered on toilet paper (25%), followed by cane sugar and tomatoes (13% each). Bottled water, soup in Tetrapak and cane sugar all had a share of at least 40% of misleading 'other' textual claims. This means almost every second product item contained a statements that was unclear, ambiguous, inaccurate or not verifiable.

Out of 49 product categories with at least one product or service containing a potentially misleading environmental claim, 48 contained at least one product or service with an uncategorised claim, with shares from 3% (lager pils) to 50% (hardwood floors). Voluntary ecolabelling schemes established at EU level were flagged for two product categories; ground coffee and paints (1% and 3%, respectively). 13 categories contained a product or service with at least one mandatory scheme that was perceived as misleading, ranging from shares of 1% (televisions) to 13% (bananas).

Table 28: Share of potentially misleading claims (food) - % of total no. assessed

	Total no. assessed	Potentially misleading…														
		...explicit environmental claims	...mandatory schemes	...EU schemes	...national or regional schemes	...other claims	...explicit environmental claims – logos/labels	...mandatory schemes – logos/labels	...EU schemes – logos/labels	...national or regional schemes – logos/labels	...other claims – logos/labels	...explicit environmental claims - text	...mandatory schemes - text	...EU schemes - text	...national or regional schemes - text	...other claims - text
Total	2911	23%	2%	0%	0%	21%	5%	0%	0%	0%	5%	21%	2%	0%	0%	19%
Food	1427	25%	2%	0%	0%	23%	6%	0%	0%	0%	6%	22%	2%	0%	0%	21%
Beverages	484	22%	0%	0%	0%	22%	4%	0%	0%	0%	4%	21%	0%	0%	0%	21%
Wine	110	16%	0%	0%	0%	16%	6%	0%	0%	0%	6%	15%	0%	0%	0%	15%
Lager Pils	36	3%	0%	0%	0%	3%	0%	0%	0%	0%	0%	3%	0%	0%	0%	3%
Ground coffee	192	22%	0%	1%	0%	22%	3%	0%	0%	0%	3%	22%	0%	1%	0%	22%
Bottled water	110	48%	0%	0%	0%	48%	10%	0%	0%	0%	10%	45%	0%	0%	0%	45%
Orange juice	36	23%	0%	0%	0%	23%	3%	0%	0%	0%	3%	20%	0%	0%	0%	20%
Cereals and cereal products	249	19%	0%	0%	0%	19%	5%	0%	0%	0%	5%	17%	0%	0%	0%	17%
Pre-packed bread	36	8%	0%	0%	0%	8%	5%	0%	0%	0%	5%	5%	0%	0%	0%	5%
Spaghetti pasta	177	23%	0%	0%	0%	23%	5%	0%	0%	0%	5%	22%	0%	0%	0%	22%
Rice	36	27%	0%	0%	0%	27%	5%	0%	0%	0%	5%	24%	0%	0%	0%	24%
Dairy and eggs	127	27%	3%	0%	0%	25%	9%	1%	0%	0%	8%	24%	1%	0%	0%	23%
Whole milk	91	25%	0%	0%	0%	25%	9%	0%	0%	0%	9%	21%	0%	0%	0%	21%
Eggs	36	29%	5%	0%	0%	24%	9%	3%	0%	0%	6%	27%	3%	0%	0%	24%
Fats and oils	106	29%	1%	0%	0%	28%	8%	0%	0%	0%	8%	29%	1%	0%	0%	28%
Margarine	36	27%	0%	0%	0%	27%	6%	0%	0%	0%	6%	27%	0%	0%	0%	27%
Olive oil	36	31%	3%	0%	0%	29%	8%	0%	0%	0%	8%	31%	3%	0%	0%	29%
Sunflower oil	34	29%	0%	0%	0%	29%	9%	0%	0%	0%	9%	29%	0%	0%	0%	29%
Fruits	107	24%	8%	0%	0%	17%	6%	0%	0%	0%	6%	19%	8%	0%	0%	12%
Apples	36	22%	3%	0%	0%	19%	6%	0%	0%	0%	6%	19%	3%	0%	0%	16%

Bananas	36	28%	13%	0%	0%	19%	9%	0%	0%	0%	9%	19%	13%	0%	0%	9%
Oranges	35	24%	8%	0%	0%	15%	6%	0%	0%	0%	6%	18%	8%	0%	0%	10%
Meat	72	29%	3%	0%	0%	26%	6%	0%	0%	0%	6%	23%	3%	0%	0%	20%
Poultry meat	36	16%	3%	0%	0%	13%	0%	0%	0%	0%	0%	16%	3%	0%	0%	13%
Beef	36	36%	3%	0%	0%	33%	12%	0%	0%	0%	12%	24%	3%	0%	0%	21%
Pre-prepared meals	104	22%	0%	0%	0%	22%	6%	0%	0%	0%	6%	20%	0%	0%	0%	20%
Lasagne	33	21%	0%	0%	0%	21%	11%	0%	0%	0%	11%	16%	0%	0%	0%	16%
Soup (in Tetrapak)	35	45%	0%	0%	0%	45%	8%	0%	0%	0%	8%	45%	0%	0%	0%	45%
Pizza	36	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
Sugar	70	33%	0%	0%	0%	33%	8%	0%	0%	0%	8%	28%	0%	0%	0%	28%
Cane sugar	16	50%	0%	0%	0%	50%	13%	0%	0%	0%	13%	44%	0%	0%	0%	44%
Granulated white sugar	14	25%	0%	0%	0%	25%	6%	0%	0%	0%	6%	19%	0%	0%	0%	19%
Sugar	40	28%	0%	0%	0%	28%	8%	0%	0%	0%	8%	25%	0%	0%	0%	25%
Vegetables	108	17%	0%	0%	0%	16%	4%	0%	0%	0%	4%	16%	0%	0%	0%	16%
Tomatoes	36	20%	2%	0%	0%	18%	13%	0%	0%	0%	13%	20%	2%	0%	0%	18%
Canned beans	36	20%	0%	0%	0%	20%	0%	0%	0%	0%	0%	20%	0%	0%	0%	20%
Potatoes	36	15%	0%	0%	0%	15%	1%	0%	0%	0%	1%	14%	0%	0%	0%	14%

Note 11: Products/services can have more than one explicit claim, i.e. they may be represented more than one time across the three categories (mandatory, voluntary ecolabelling schemes established at EU level, voluntary ecolabelling schemes established by national or regional public entities, other) but are only included once in the total.

3 IN-DEPTH ANALYSIS OF ENVIRONMENTAL CLAIMS

The statistical analysis presented in Section 2 focused on the presence and type of environmental claims in a sample of commonly used food and non-food products, and briefly assessed whether such claims could be considered misleading. The study also investigated a sample of 150 environmental claims in greater depth to better understand their clarity, accuracy and the extent to which they could be verified.

Article 6 of the UCPD protects consumers from producers' claims that contain false or untruthful information or are presented so as to deceive the consumer. The information should relate to the nature of the product, its main characteristics - including its environmental benefits - method of manufacture, and geographical or commercial origin. This information can take the form of a statement, information, symbols, logos, graphics, brand names and use of colours on packaging, labelling and in advertising. Article 7 relates to misleading omissions, which includes the practice of providing unclear, unintelligible or ambiguous information on the product. According to Article 12, traders must be able to present evidence supporting the factual accuracy of their claims to competent enforcement authorities in cases where the claim is challenged. All of these provisions apply to environmental claims and formed the basis for the in-depth analysis in this study.

This section presents the process and results of the analysis, including some overall lessons learned.

3.1 Methodology

The in-depth analyses were carried out by a team of national legal experts who were briefed on the UCPD and the Commission's 2016 guidance on the implementation and application of this Directive, in particular Section 5 on environmental claims[53]. Experts dedicated about one day of research to each assessment, which allowed for a more nuanced perspective on the nature of each claim. The legal expert team did not have prior technical or scientific expertise or knowledge of the specificities of the product categories under investigation, and thus reviewed claims from the perspective of an educated consumer. The primary aim of this work was to better understand the variety of ways in which claims might or might not be considered misleading. Due to the smaller sample size, it did not set out to provide statistical conclusions about environmental claims in individual Member States, markets or product categories, nor to challenge the results of the statistical analysis presented in Section 2.3.5.

3.1.1 Sample selection

As the time and resources for the study did not allow for full in-depth assessment of all the claims identified by the mystery shoppers and advertisement analysts, the study focused instead on a sample of 150 claims and drew qualitative conclusions. The sample thus looked at the claims mostly likely to yield interesting observations on the nature of misleading claims, prioritising the following:

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[53] European Commission, *Guidance on the implementation/application of Directive 2005/29/EC on unfair commercial practices*, SWD(2016) 163.

- Explicit environmental claims that were perceived as misleading by the evaluators in the statistical analysis;
- Preference for a balance of claim types, i.e. text, logos (although the majority of claims identified were text claims);
- A selection covering the 15 Member States included in the study;
- Coverage of all product categories included in the study (to the extent possible).

In order to try to understand a variety of types of claims, preference was given to claims from the 'other' category rather than those linked to legislation requiring the disclosure of environmental information or to voluntary schemes (EU Ecolabel, organic label or national certification/labelling schemes). Nevertheless, some claims from these categories have been included, both to understand compliance and to ensure that the sample covered the points presented above.

3.1.2 In-depth analysis process

The in-depth analysis was carried out in three stages, with templates and guidance to ensure quality and consistency in the work of 15 national legal experts.

Stage 1: Preliminary country research

Each national expert first identified requirements on environmental claims included in the national legislation. This information fed into the categorisation of claims in the statistical analysis (see Section 2.2.3) and also served as a basis for understanding the environmental claims during the in-depth analysis. Research was conducted on the following:

- **Mandatory requirements for environmental claims** on products or in advertising, e.g. prohibition of the use of the words 'natural' or 'sustainable' unless certain requirements are met.

- **Legislated voluntary environmental labelling schemes** to identify labelling schemes for consumer products established in legislation by the Member State (e.g. Blue Angel scheme in Germany). Schemes established and operated independently from the government were not included.

- **Codes of conduct for environmental claims.** For example, an independent association for the advertising industry in Spain has enacted the 'self-regulation code on environmental claims in commercial communications'. Companies voluntarily undertaking this code may say so in their advertisements.

- **Consumer law – legal guarantees.** Experts were asked to check whether legislation in the Member State requires a legal guarantee of more than two years for consumer products.

- **Additional information**. Experts were asked to record any other notable features in the national framework related to environmental claims for consumer products.

Stage 2: In-depth analysis of claims

Article 6 of the UCPD implies that consumers must be able to trust environmental claims made by traders. Consequently, in order not to be misleading, environmental claims should be presented in a clear, specific, unambiguous[54] and accurate manner and the claims made should be substantiated. National experts were required to analyse the individual claim for each of these aspects (following the general instructions in the template provided) and conclude whether or not the claim is misleading. The annotated analysis template in Annex VI provides further details about the analysis method.

Before conducting the assessment, experts were required to check: 1) that the claim was an actual environmental claim (see Section 2.2.3); and 2) whether the claim was associated with a mandatory or voluntary scheme, as these claims were not prioritised for assessment (see Section 3.1.1).

Experts were instructed to consider all features of a claim: wording, imagery and overall product presentation. They were asked to analyse just one claim per product/advertisement even if it contained more claims (although the other claims were taken into consideration during the analysis if they provided context). In conducting the analysis, experts checked the websites of products/traders and producers, and considered the national frameworks identified during the first stage of the work. In some cases, particularly if information to substantiate the claim could not be found via internet research, experts contacted producers directly.

Stage 3: Quality assurance and synthesis of results

A small team of quality assurors was identified to review the in-depth analysis fiches for sense, completeness and consistency in approach and judgements. These were revised by the national legal experts as required. Results were then synthesised and analysed by this team and are presented as findings in the following section.

3.2 Findings

### 3.2.1 Overview of claims analysed and results

The sample of claims by country and product category is shown in the two figures below.

The 150 claims included in the final sample covered all 15 of the countries included in the analysis. Numbers per country varied according to the number of claims that met the sample criteria, in particular explicit claims not adhering to mandatory requirements or labelling schemes.

The share of product categories included in the sample depends to some extent on the number of explicit environmental claims identified in the data collection activities for each product category (see Section 2.3.1 and Tables 3 and 4) and the share of such claims perceived as misleading by the mystery shoppers and advertisement analysts. Seven product categories were not included in the sample of claims analysed in-depth, as no suitable claims were identified for analysis.
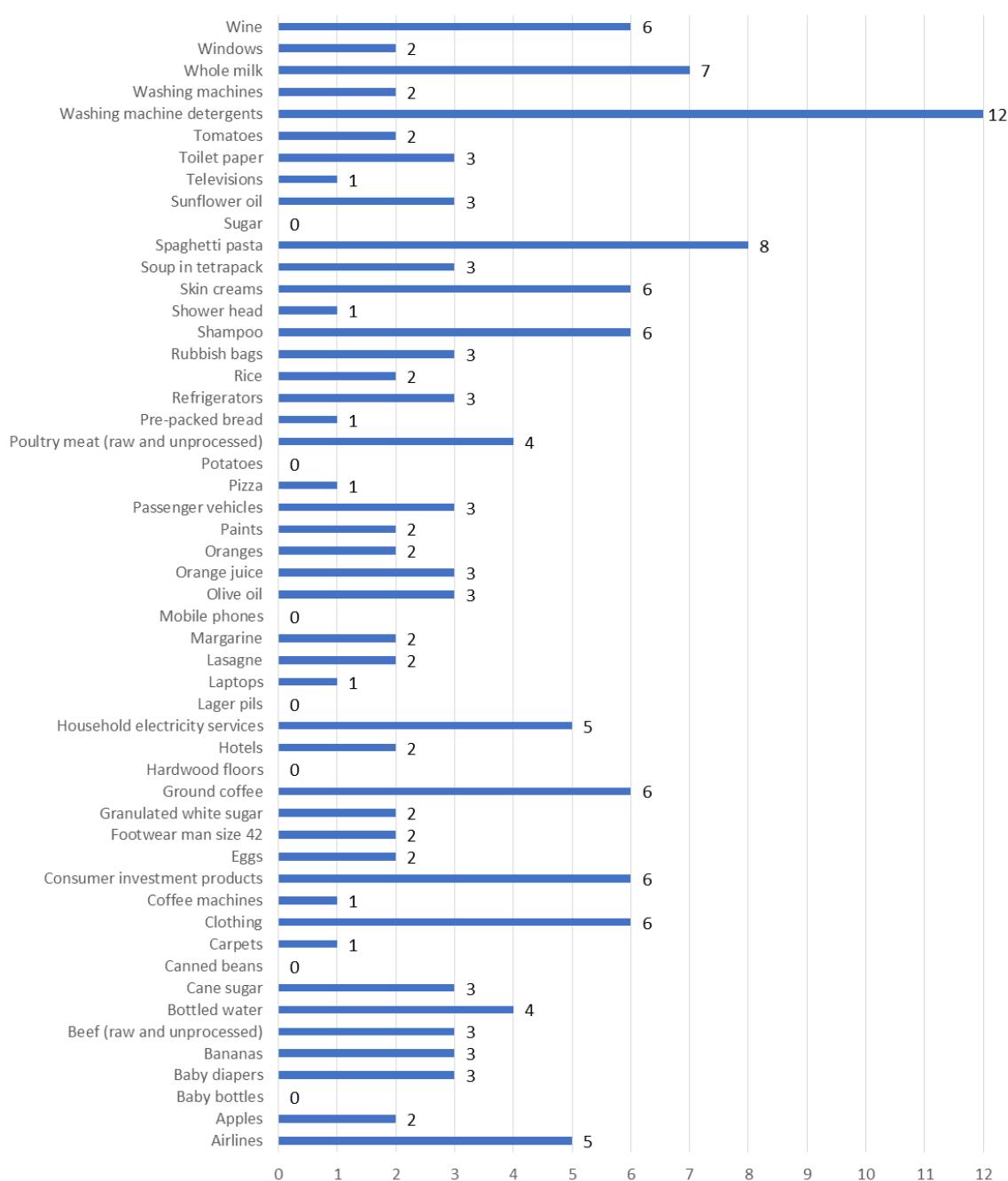
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[54] In cases where claims were incorrectly identified as environmental claims, this information was passed to the team conducting the statistical analysis.

Figure 2 Total claims analysed, by Member State
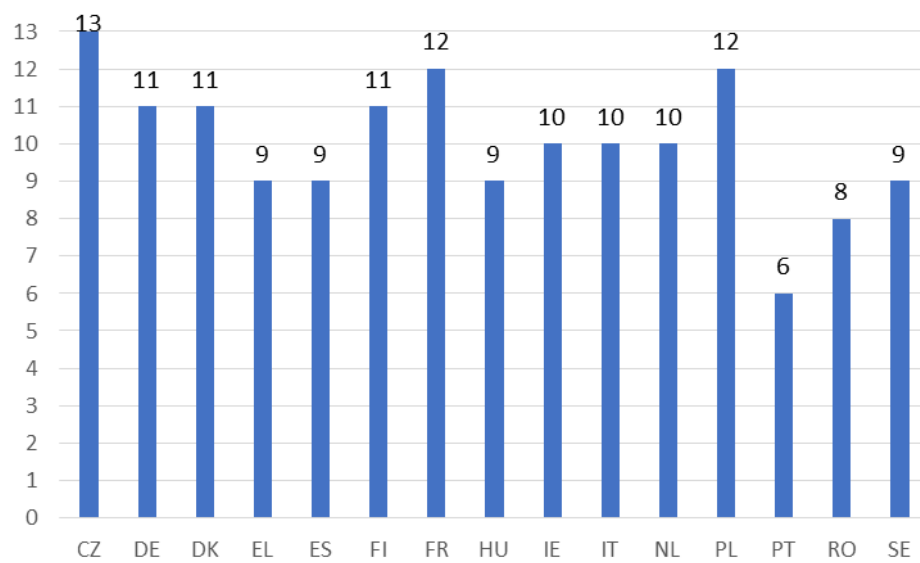

Source: Milieu calculations

Figure 3 Total claims analysed, by product category

Source: Milieu calculations

The national legal expert team found 53.3% (80 of 150) of the environmental claims to be misleading. A claim was assessed as misleading if it was assessed negatively on one or more of the three assessment criteria: 1) clear and unambiguous, 2) accurate, and 3) substantiated. Where a claim was assessed positively on all three criteria, it was classified as not misleading. Figure 4 presents the number of misleading/not misleading claims, as judged by the national legal experts against the assessment criteria.

Figure 4 Misleading and not misleading claims, according to the assessment criteria
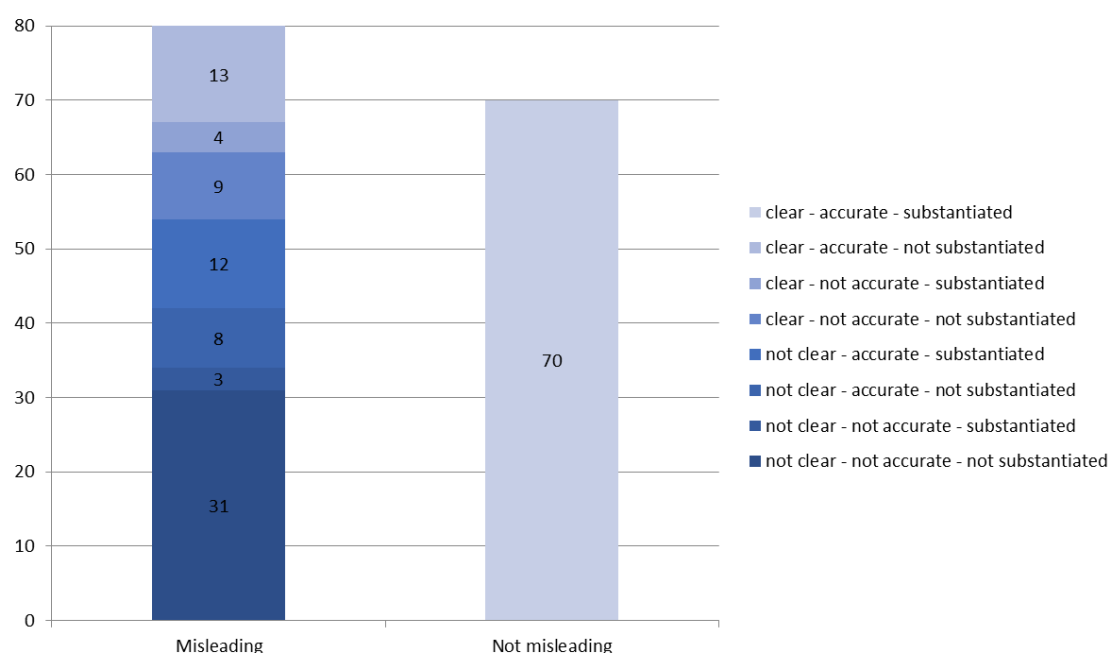
The largest group of the misleading claims (31 out of 80) failed on all three assessment criteria. Second was the group of 13 claims that were assessed as clear and accurate but lacking substantiation, while third (12) were the claims that were not clearly stated but were nevertheless accurate and substantiated. Only three misleading claims were assessed as neither clear nor accurate but were still considered substantiated.

These results must be read with caution, as the assessment of the claims were not always conclusive, with many claims falling into grey areas. For clarity, the national experts were asked to conclude their assessment of each criteria with a simple yes-no and to state their doubts or uncertainties in their analysis. Some examples of those difficulties are presented below:

- '50% recycled polyester' (clothing): 'The claim is clear, unambiguous and accurate, and there is some substantiation on the brand's website. However, when reading this substantiation, the consumer does stumble upon some unclear information that is too general and unspecified to be meaningful.'
- 'Committed to preserving biological diversity' (apples): 'The advertisement contains elaborate descriptions which could potentially substantiate the claim about biodiversity protection but it remains unclear on the point of using pesticides - while natural methods are preferred, the company remains open to using chemical pesticides, and the choice of one method over the other is not clear.'
- 'With plant-based biodegradable ingredients' (washing machine detergents): 'The claim says that the product has been made with plant-based biodegradable ingredients but it is not clear if all the ingredients are plant-based and biodegradable or just a selection of them.'
- 'Organic meat' (beef, raw and processed): 'The claim is rather clear, unambiguous and accurate. The claim is substantiated in the producer's website. However, the EU organic logo is not included in the packaging, which renders the claim misleading.'

While the small sample size does not allow conclusions to be drawn about particular types of products, some observations are possible:

- Claims that were mostly found to be misleading were consumer investment products (5 out of 6); skin creams (4 out of 6); spaghetti pasta (7 out of 8) and wine (5 out of 6);
- Claims least likely to be found to be misleading were ground coffee (4 out of 6); shampoo (4 out of 6); and whole milk (6 out of 7).

Overall, these results are similar to those of the data collection exercise, which found that more than half of assessed products/services webpages and advertisements containing an explicit claim showed a potentially misleading statement (Section 2.3.5). However, comparisons should be made cautiously, given the differences in sample selection methods and analysis approach. Looking in detail at some of the specific claims highlights some interesting differences in how claims are likely to be perceived by average consumers making quick judgements (based only on the information available on a product or the substance of an advertisement) compared to consumers with more specialised awareness of the regulations on environmental information, labelling and commercial practices, and the time to conduct some research.

For many of the claims, the results were similar, particularly for clarity/ambiguity. However, some claims yielded quite contrasting results, illustrating the different impressions that certain claims can have on the average versus the expert consumer. For example, some claims were considered clear by the legal expert but not at all clear by the data evaluator, such as the organic label (orange juice; beef; and ground coffee). It is possible that the average consumer does not know that the presence of such a label is required here. In the case of the beef, the organic label was not displayed properly on the product.

In other cases, the data collection evaluator perceived the claim as clear, while the in-depth analysis found the reverse. Many of these cases seem to be attributable to specialist knowledge. For example, a claim referring to synthetic leather shoes in Italy as made from 'eco-leather' (footwear men size 42) was considered clear and accurate during mystery shopping, while the legal expert was aware of the fact that, under Italian regulations, the term eco-leather should only be used for products of animal origin, obtained and processed in specific ways.

Some claims initially seem reasonable but after more serious consideration are not entirely clear. A claim that plastic packaging (sunflower oil) was recyclable was considered clear and accurate by the mystery shopper, which makes sense given that most plastic bottles are put in household recycling bins. However, as there was no information available for the consumer to determine the type of plastic and to verify whether it was actually recyclable, the in-depth analysis judged this claim potentially misleading. Milk claiming to be 'naturally from Ireland' sounded acceptable to the mystery shopper but, as this does not give any details about the product's natural origins, was considered unclear by the legal expert. In another case, a TV advertisement for orange juice (orange juice) claiming 'when you take care of nature, you get the best fruit' was perceived as clear by the advertisement analyst, while the legal expert could not determine the meaning of the statement during in-depth analysis.

The data collection team were generally reluctant to declare a claim inaccurate based on immediate perception - most responses were 'yes' or 'do not know'. A digital video advertisement (margarine) stated that 'the plants used in this product store more CO_2

than they emit'. It is likely that the advertisement analyst perceived the claim as accurate based on common knowledge that forests and greenery can absorb CO_2. However, the legal expert was able to determine that the plants used to harvest seeds for oil are at best CO_2-neutral, notwithstanding their likely need for water and fertiliser. Likewise, a seemingly valid claim that the low content of volatile organic compounds (VOCs) in paint renders the product 'much safer for people with allergies' was not well substantiated and considered inaccurate by the legal expert.

Unsurprisingly, the data collection team found many claims difficult to verify, as the information was not readily available on a product web shop or from an advertisement, and these concerns were later substantiated during the in-depth analysis. In a small minority of cases, the data collection team felt that a claim would be easy to verify, but this was not substantiated by the legal expert's research.

3.2.2 Summary of in-depth analysis

The sub-sections below provide a summary of the in-depth analysis of the selected environmental claims. The analysis is structured according to the three assessment criteria - clarity, accuracy, substantiation. The last sub-section (3.2.4) deals with the relevance of the claims for the main environmental aspects identified within the framework of the Product Environmental Footprint (PEF).
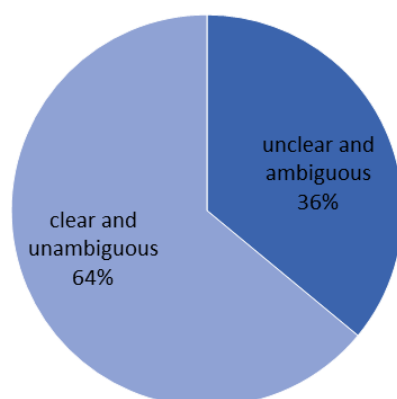
3.2.2.1 Clear and unambiguous

All claims assessed by the national legal experts were first examined to determine if they were clear and unambiguous in disclosing the product's environmental benefits and impacts. Guidelines were provided to ensure homogeneity as far as possible. For example, experts were told to be critical of claims with:
- general statements, such as 'environmentally friendly' 'green', 'ecological', 'sustainable', 'climate-friendly', or 'gentle on the environment';
- multiple meanings (when the meaning to which the claim refers is unclear);
- comparisons, if the reference is not clear;
- misleading omissions, i.e. that ignore or avoid negative environmental impacts;
- own labelling schemes used in place of industry standards.

Experts were also instructed to assess the claim for clarity and ambiguity, independent of other aspects. For example, a claim that the packaging is 'widely recycled' may well be judged 'clear', even if the claim cannot be considered accurate (can the average consumer recycle it?) or substantiated (what evidence is there to support this). The accuracy and substantiation of the claims will be discussed in subsequent sections.

Just over one-third (54 of the 150 claims under in-depth analysis) were identified as unclear and ambiguous (see Figure 5). The main reason for this assessment was that many of the claims were overly general: they used words like 'natural', 'eco', or 'bio' or the claim could not be linked to any specific characteristic of the product. A number of claims were assessed as 'unclear' even if further research (i.e. substantiation) meant the claim became clearer. For example, a claim that milk is 'naturally from Ireland' (whole milk) is unclear on its own, but further investigation reveals that the milk is organic. To a lesser extent, claims were considered unclear due to omissions of relevant information.

Figure 5 Is the claim clear and unambiguous? (n=150)

Clear and unambiguous claims

Experts found many good examples of very clear, unambiguous claims. Examples included an advertisement for poultry (poultry) that stated 'Do you care about the climate? Chicken only has one-tenth of beef's carbon dioxide emissions. This makes chicken one of the climate-smartest protein sources in the business community'. The claim clearly identified the environmental impact (climate), compared the product clearly to a similar type of product (beef), and concluded that it is one of the climate-smartest protein sources[55]. Other examples were simpler: 'a total absence of pesticides and synthetic chemical fertilisers' (olive oil), 'net-zero climate footprint' (whole milk), or the organic claims found on food items, due to the regulations on the use of such wording.

Vague textual claims

The vast majority of unclear claims were textual claims, most of which stemmed from the use of vague wording. A number of words often used in environmental contexts stood out. While they certainly invoke environmental connotations, they are not specific and cannot be considered clear and unambiguous. The assessment showed that general and vague claims often used terms such as 'nature/natural', 'sustainable', and 'eco'. In a lot of the examples, these terms were used as a general catch-all, without any apparent reference to a specific environmental impact. For example, an advertisement for water bottles stated only 'we bring nature where you least expect it' (bottled water), along with the producer's logo. It appeared that marketers used the words purely to grab the attention of consumers attempting to shop more responsibly.

Some claims promoted the product as 'bio' or 'eco', including for products outside the scope of the Organic Regulation[56]. In some cases, the distinction was clear and the claim obviously did not refer to organic agriculture, for example an 'eco-friendly' water bottle

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[55] Whether the claim is accurate and substantiated is not considered in this section.
[56] Article 1(2) of Regulation (EC) No 834/2007 sets the scope: unprocessed agricultural products and processed agricultural products for use as food.

lid (bottled water) or an 'eco' fuel engine on a car (passenger vehicles). A claim on footwear stated that the shoe was 'eco-leather', even though further investigation showed that the shoe was made of synthetic leather. Similarly, the use of 'bio' can be confusing and even misleading. For example, several washing machine detergents were identified as 'biological' and more during the selection of claims for in-depth analysis). Biological washing detergent refers to detergent that uses enzymes to help to remove stains – it does not mean organic as set out in EU legislation. While this is relatively standard terminology, the assessment found that both mystery shoppers and some national legal experts (especially in non-English speaking countries) were indeed misled. While these examples were not in breach of EU organic legislation[57], they were nevertheless considered unclear and ambiguous.

'Natural' was used to describe certain products, such as 'natural water' (bottled water), wine (wine), 'natural leather' (footwear men size 42), product ingredients (skin cream, sunflower oil; soup), or the producer itself (skin cream). These claims did not specify what made the products 'natural' – it could only be assumed it referred to the ingredients themselves, rather than how they were produced (not all ingredients were identified as grown organically) or manufacturing/processing processes. This was supported by the ingredients of products like skin creams, where non-synthetic ingredients were highlighted. In at least one wine claim, a word similar to natural (i.e. 'natur') was used, apparently to persuade consumers that the line of wines was more environmentally responsible (wine).

Another commonly used term in claims is 'sustainable', which seemed to refer not only to ingredients but also to production processes. For example, one claim stated that '100% of coffee verified as sustainable' (ground coffee), while another stated that 'the… noodles are regional and sustainable' (spaghetti pasta). Both of these claims were considered unclear. Other claims provided more details, making them clearer: '100% recyclable paper for a more sustainable planet' (rice) or 'shea is a sustainable alternative to palm oil' (margarine). 'Sustainable' was often used for non-food products. For products such as airlines or hotels, most companies assessed had sustainability declarations. One consumer investment product was described as 'truly sustainable', while another promoted the company as 'sustainable'. These claims were not insufficiently specific to be considered clear and unambiguous.

Some claims maintained that the producer cares about 'nature' and the 'environment', for example 'we are working together with nature' (apples), and 'when you take care of nature, you get the best fruit' (orange juice). Alternatively, it was highlighted as something the consumer should care about: 'designed for those who do not compromise on the environment, quality or the health of your child' (baby nappies) or 'we save a lot of packaging material – that makes nature and the customers happy' (oranges). Each of these claims (except the last) was deemed unclear, as they did not equate to any specific action, nor was it clear that they actually contributed to reducing environmental impacts. The oranges' claim to 'make nature happy' was considered clear only because reduced packaging was the crux of the claim, rather than making nature happy.

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[57] Organic legislation does not prevent the use of the terms referring to the organic production method, such as 'bio' or 'eco', in products not related to agricultural products or on products where there is clearly no connection with organic production. See 'Frequently asked questions ON ORGANIC RULES', https://ec.europa.eu/info/sites/info/files/food-farming-fisheries/farming/documents/organic-rules-faqs_en_0.pdf

Omissions

Several examples of potentially misleading omissions were found. For example, 'certified GMO-free' was clearly stated on a package of pasta (spaghetti pasta). It was only on closer examination that it was evident that the claim referred solely to the fodder fed to the chickens laying the eggs used in the recipe. There was no indication that the other ingredients (specifically the wheat) was also certified GMO-free. It is plausible that there are further omissions in the claims: a plastic bottle containing sunflower oil was advertised as 'recyclable' (sunflower oil) but the extent of that recyclability was not clear – not all municipalities have the capability to recycle all sorts of plastic, and desk research suggests that oil bottles are particularly difficult, due to residue.

Other examples showed claims that clearly did not consider the main environmental impacts of the product. This included clothing that claimed the product was '50% recycled polyester' (clothing). While the claim suggested the product could be considered an 'environmentally friendly product', it did not consider the impact of microplastics shed by the garment (synthetic material) during washing. A second claim also considered recycled polyester in clothing (clothing), but stated it was to 'save resources and reduce gas emissions'. Further investigation would be needed to determine whether the impact of microplastics is greater than saving resources and reducing gas emissions. A second example concerned windows sold as 'environmentally friendly' (windows). According to the claim, this was because they are recyclable. The fact the windows are recyclable, while commendable, may not be sufficient to warrant calling them 'environmentally friendly', if this is the sole environmentally relevant characteristic.

3.2.2.2 Accuracy

The criterion of accuracy aimed to reveal if the claim was truthful. As the national experts did not have technical expertise on the different techniques/methods that could render a claim true, national experts were asked to assess - based on their knowledge of environmental law and policy - whether something in the claim would make them think that it was not true.

Accuracy depended on the level of ambiguity of the main statement or other feature being assessed as the environmental claim, as well as the substantiation of the claim provided by the traders and/or producers.

The majority of the environmental claims that were assessed as clear (96 out of 150) were also assessed as accurate (83 of the 96 clear and unambiguous cases). Of the 54 claims assessed as not clear, the majority (34) were also judged as inaccurate. However, there were numerous cases (20 out of 54) where unclear claims were further assessed as accurate – in these cases the national experts gave more weight to substantiation than to the (vague) way the claim was formulated. More statistical details regarding the relationship of accuracy to clarity are presented in Figure 6 below.

Figure 6 Accuracy versus clarity of environmental claims in the assessed sample
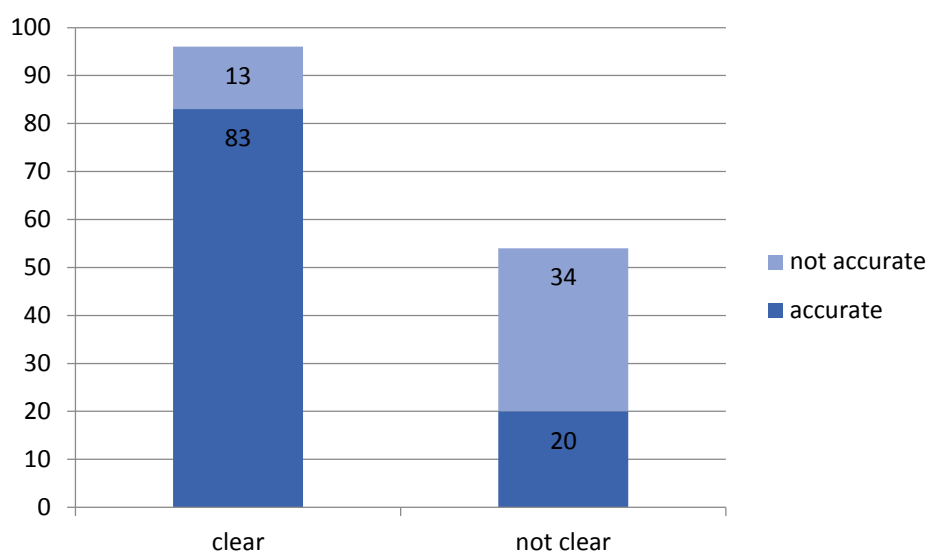
Source: Milieu calculations

Assessing accuracy was a more straightforward process in case of claims whose statements referred to certification schemes or presented specific comparisons or other quantitative values. In such cases, the decision on whether the claim was accurate was largely taken on the basis of substantiation provided for the specific value/comparison.

Accurate claims

The majority of accurate claims (83 out of 103) came from the group also assessed as clear and unambiguous. These were typically obvious claims pointing to clear characteristics of the product, such as 'organic beef burgers' (beef: raw and processed), EU Ecolabel (paints; shampoo), or 'sustainable agriculture' (ground coffee). The majority of the claims that were clear and accurate were also assessed as substantiated and were not misleading (70 out of 83 clear and accurate claims).

In 13 cases, the product was finally deemed misleading, despite experts' perceptions of clarity and accuracy, given the lack of sufficient substantiation. Examples includes the claims on bio bananas, which were presumably true but experts found no evidence of organic certification, the claim on minimising food waste (refrigerators), where the substantiation provided was assessed as insufficient, and the claim on 'certified GMO-free' (spaghetti pasta). In that case, after quite a detailed investigation (revealing that the GMO-free related solely to the fodder fed to the chickens whose eggs produced the spaghetti pasta), the national expert assessed the 'certified GMO-free' claim as not substantiated and therefore potentially misleading.

In 13 of 96 claims assessed as clear and unambiguous, the national experts found them inaccurate. This was the case, for example, for '100% recycled plastic bottles' (washing machine detergents), 'certified organic' (wine), and 'the highest energy class' (refrigerators). This judgement was linked primarily to (lack of) sufficient substantiation: the recycled bottles contained only 50% of recycled plastic, there was no evidence that the wine in question had obtained any organic certificates, and the refrigerator was labelled with an A++ energy label (A+++ is the highest standard).

Accurate claims were also found in a group of claims assessed as not clear – this happened in 20 out of 54 claims that were seen by national experts as ambiguous. If such ambiguous claims were very well substantiated, the national experts often assessed them as accurate despite being vague. This was the case for 'gentle on our planet' washing powder (washing machine detergents), 'naturally from [X country]' (whole milk), and '100% coffee verified as sustainable' (ground coffee). The producer of the washing machine powder provided extensive information on the package and on its website, stating that the composition of the package is 100% recycled plastic, the product does not contain synthetic perfumes, colorants and optical brighteners, and the composition is 97% plant-based. In addition, the product is certified with the EU Ecolabel. The milk was found to be produced on farms certified as organic. The coffee producers' website first clarified the meaning of the concept 'sustainable' and further explained that the company relies on three different certificates of sustainability: 'organic', 'UTZ certified' and 'Fairtrade'.

Vague statements vs accuracy

As noted in Section 3.3.2.1, many claims are formulated in a vague and overly general way and do not easily lend themselves to assessments of accuracy. The slogans and statements used have positive connotations related to environment and/or sustainability but often lack specific aspects or lifecycle stages, which limits their accuracy. This was found to be the case for apples that were advertised using the slogan 'we are working together with nature', and for orange juice ('when you take care of nature, you get the best fruit'). In both cases, the information available on the producers' websites point to the producers' approach to sustainable production, various practices, standards for farms and factories, etc. While the producers seem to be doing more than required with regard to the environment and nature, it is still not clear how this would yield the 'best fruit' or how they are working 'together with nature'. The meaning of the claim 'best fruit' was deemed ambiguous – was it best for the consumer (because of taste or health reasons) or best from the environmental point of view? The claim was therefore neither clear nor verifiable for accuracy.

For the claim concerning apples, it was not possible to check its accuracy with respect to the apples available on the specific market. While various environmentally friendly activities seem to be undertaken by producers of the advertised brand of apples worldwide, it is not evident that all are undertaken on all national markets where the apples are sold.

A similar doubt arose about the extent to which the claim referred to the specific product rather than the producer in general. For instance, a green logo with birds (pizza) seemed to indicate that the product is environmentally friendly but the information found on the producer's website provides statistics referring to the percentages of responsibly sourced ingredients globally rather than information referring to the specific product.

General statements may create an impression that products are entirely sustainable or environmentally friendly in all respects. This was the case with 'sustainable noodles' (spaghetti pasta), where it was difficult to determine the stage(s) of the product lifecycle and/or characteristics of the products to which the statements related. Substantiation explained the claim to some extent (for some specific features of the product) but remained insufficient to say that the claim was accurate in suggesting that the product is fully sustainable.

A similar observation was noted for 'environmentally friendly windows'. The substantiation here referred to a specific feature, namely recyclability. However, it was not clear which lifecycle stage is meant (the producer refers both to responsible sourcing of materials and to end-of-life stage of the product, without giving more details).

Vague statements referring to sustainability often appeared in environmental claims for hotels and consumer investment products. Examples included the claim on support for development towards a more sustainable global economy (consumer investment products) and the claim on the 'planet 21 commitments' (hotels). In the latter, the hotel chain pointed to a number of commitments deriving from its 'planet 21' programme, without providing any information about the level of their fulfilment, undermining the accuracy of the claim.

Prefixes

Several claims use prefixes such as 'eco' or 'bio', which, in some cases – particularly where products are not certified as coming from organic agriculture - had neither a clear meaning nor were they assessed as accurate. Examples included using the prefix 'bio' or 'eco' when the product's environmental qualities were not clearly explained and substantiated. Regulation (EC) No 834/2007 on organic production and labelling for organic products in Article 23 lists 'bio' and 'eco' as terms that can be used for the labelling and advertising of products that satisfy the requirements set out under the Regulation. This was observed in several claims assessed, including 'eco wine', 'Biogan rice', and 'bio lasagne' (pre-prepared meals) – which were clearly organic products.

Using such a prefix to mean 'organic' was not the case on an olive oil containing the prefix 'bio' in the brand name (olive oil), which lacked indications that the product was organic according to EU standards or that it followed some other (e.g. national) equivalent or comparable standard. In this case, the national expert was misled by the 'bio' prefix, stating that common understanding would suggest that the product was organic, which was not true.

The national experts assessed the use of prefixes 'eco' or 'bio' as accurate in certain cases where Regulation 834/2007 concerning organic products did not apply, as the products did not originate from organic agriculture. These were, for example, the cases of 'Eco PFC-Free sportswear' (clothing), 'Eco carpet', 'Eco rubbish bags', and 'Ecorevolution' (toilet paper). The producers/traders provided careful and detailed substantiation of their claims, which allowed the consumer to quickly see why the products were described as environmentally friendly, or 'eco'.

Comparisons and numbers

Several claims in the sample contained comparisons or specific numbers. The process of checking the accuracy of these statements was relatively straightforward – the experts tried to verify if the information used for advertising the product or service was truthful. However, this proved somewhat challenging for many claims. For example, in a claim on the environmental performance of a company (airlines), the expert found no evidence for the provider's claim to pollute less than other EU airlines or why it was the company with the best environmental performance. A similar claim for airlines ('a sustainability leader among airline companies') was found to be clear, accurate and substantiated, as it pointed to a specific action - use of sustainable fuel - which warranted its environmental profile.

The claim 'more welfare' (poultry) offered a comparison with an unknown benchmark, which made it neither clear nor accurate, despite the producer placing a lot of information on the website that could be used to substantiate the claim (that substantiation was not fully conclusive, as the standards used in breeding the chickens were not above the national minimum).

Similar doubts can be raised with respect to the claim relating to the use of fuel by a hybrid car: '10 times less than a petrol car'. This claim seemed clearer, as it offered a concrete number for a comparison, which, in principle, should be easier to verify than the vague gradation 'more'. Again, however, the benchmark for comparison was not well defined. The producer claimed that the user of the hybrid car would spend only 12 euro per month on petrol, which is 10 times less than a car using petrol. A ten-fold difference is a substantial amount that can easily be questioned and neither the advertisement nor the producer's website provided any details on how this range of savings was calculated or the assumptions made in the comparison with a 'petrol car'.

Several claims concerned the percentage share of recycled material. This was the case for the claim '100% recycled plastic bottles' (washing machine detergents), 'recycled PET bottle, 100% recyclable packaging (PET, PP)' (shampoo), and '50% recycled polyester' (clothing). In the first, the claim was not accurate, as the company's webpage stated that laundry detergents' bottles only contain 50% recycled materials and not 100% as claimed in the advertisement. The second and third claims lacked substantiation.

Lastly, a number of environmental claims in the sample referred to a lower carbon footprint or climate compensation with quantitative statements. A coffee producer claimed that their coffee was '100% CO_2 compensated' (ground coffee). However, no information was available on the verification of that compensation.

Similarly, two claims made were '100% climate-compensated pasta' (spaghetti pasta) and 'net-zero climate footprint' (whole milk). In these cases, however, the claims were explained in more detail on the producers' websites and substantiated with evidence (thus assessed as not misleading). The claim on '56% lower carbon footprint' (tomatoes) was assessed as not misleading due to extensive substantiation on the producer's website.

3.2.2.3 Substantiation

National experts needed to check the extent to which the claim was verifiable through evidence available to the public. They were asked whether they could find the websites of the seller and producer, a QR code, contact details or the specific name of an environmental label or code of conduct. If no link was provided to the website, they were asked to carry out an internet search to locate the website or the information searched. Experts noted any information found about the substantiation of the claim, including labels or certification schemes. If no information was found, they emailed the trader requesting information about the environmental claim.

A total of 61 (40%) of the 150 claims considered for in-depth analysis were considered unsubstantiated. In most cases, substantiation was partial, meaning that even if some information was provided, it was assessed insufficient to fully substantiate the claim. In an important number of cases, online substantiation was non-existent and no further information was provided by email. In a few cases, it was difficult to link the reasons provided to back up the claim with the actual claim. Finally, for a few claims, it was very difficult to find the substantiation.

Of the 83 claims judged as both clear and accurate, 70 were also substantiated. Where the claim is not accurate, it was also most likely not substantiated (40 out of 47 cases). Only 21 claims out of 103 were considered accurate but not substantiated. Figure 7 provides more details on the relationship between substantiation, clarity and accuracy.

Figure 7 Substantiated vs not substantiated claims, by clarity and accuracy
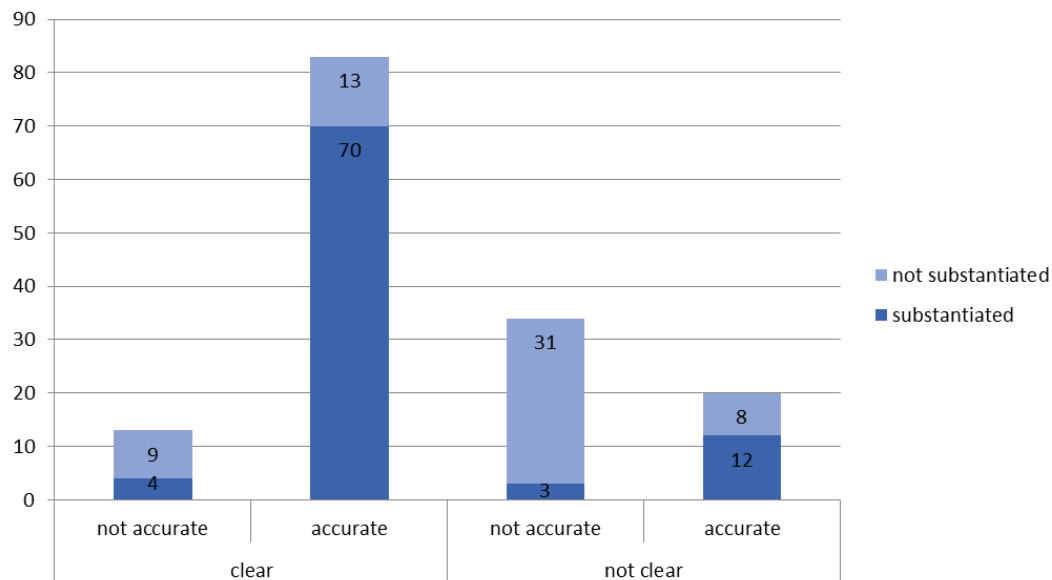
Substantiated claims

There are several examples of claims that were well substantiated.

The claim 'we think of nature' (whole milk) is, in principle, vague. However, a closer look at the packaging and the website substantiated the claim. The package itself stated that it is 100% recyclable, with the paper sourced from responsible wood production. It also stated a 'carbon-neutral footprint'. These 'supporting' claims were substantiated on the website, which explained the recycling methods for the paper and plastic packaging, membership of the FSC. It also explained how to find the certified carbon-neutral logo next to the barcode of the product, indicating its efforts to reduce its carbon footprint through internal measures.

Another company stated that its product was 'made of recycled polyester (86% recycled polyester)' (clothing). Although the webpage of the product did not contain the substantiation, the section on 'sustainability' of the company explained 'recycled polyester', how is it made and the implications of its use. The website also provided the relevant sustainability contact details.

A very specific claim '-56% smaller carbon footprint' (tomatoes) was substantiated by the advertisement itself. The ad included a reference to a recent study by a scientific institute, which provided support for the claim. It also included a link directing the consumer to the webpages of the of a horticultural association, which explains further the sustainability of growing vegetables in the specific geographic area.

The claim on 'the paper that saves trees' (toilet paper) was also well substantiated on the retailer's website. The composition of the product was clearly presented and showed that

the paper was made of 100% of recycled fibres from beverage cartons. The website provided a link to a website describing a new raw material made from recycled cartons, with its own logo. This other website clearly showed the recycling process, with an explanatory scheme highlighting the composition of beverage cartons and the presence of cellulose (the key resource to produce recycled paper). The website emphasised the circularity of the recycling process and the zero-waste approach adopted. It even explained that the remaining components of the beverage cartons were also recycled to produce other manufactured goods. The company has obtained several certifications, including the EU Ecolabel.

The claim '100% climate-compensated' (spaghetti pasta) is a strong statement. The producer's website explained that they had asked a consultancy specialising in sustainability to calculate the climate impact of the producer's entire range of products. Based on that calculation, the producer was climate-compensating for 100% of that impact. The website provided information on how this was achieved, how often (every six months, based on the sales forecast), and with the help of which company.

No or very limited substantiation

Some claims were not substantiated on the packaging, on the seller/producer's website or even through an internet search. This was particularly true for the terms 'bio', 'eco', 'sustainable' and 'organic'. Some examples were represented by the claims 'organic' detergent for a washing machine (washing machine detergent), 'eco-bananas' or 'eco-friendly' clothes. For these claims, the producer did not provide any information proving that that the products were produced using any specific 'eco' technique or that they comply with EU organic standards. Substantiation was thus considered non-existent in each case.

In some cases, the websites did provide some information, but this was not sufficient to substantiate the claim. For instance, the claim 'a sustainable choice' (clothing) made direct reference to the materials used in the production of underwear, but it was not evident from the advertisement if the production was based entirely on organic cotton or if non-organic cotton was also used to some extent. On the website, eight different pieces of underwear were described as being produced from 100% organic cotton. As the products did not appear to carry any kind of ecolabel or a certificate granted by an independent institution, the claim that the cotton was organic was unsubstantiated.

The claim 'sustainability leaders' (consumer investment product) reproduced points from the UN Global Compact (i.e. businesses should support a precautionary approach to environmental challenges, undertake initiatives to promote greater environmental responsibility, and encourage the development and diffusion of environmentally friendly technologies) as the only substantiation. These statements are rather vague and there was no information as to how the company is addressing these points.

Similarly, regarding the Code of Ethics of an electricity provider (household electricity services), the company claimed to encourage research and innovation to develop know-how on efficient use and recycling of materials, reducing the use of natural resources, and reducing the harmful effects of certain activities. No further information was provided, however.

The lack of substantiation was also found for a specific label on a bottle of wine that included the text 'environmental care'. Although the producer's website included a list of

'green' certificates, none was the label included on the bottle and an internet search could not clarify what the label meant.

Partial substantiation

Some producers provided some substantiation to back up their claims but the information provided was incomplete or inconclusive. In some cases, there was a degree of substantiation, albeit poor, while in others, the substantiation was deeper but lacked persuasive information.

For instance, a claim on a window that 'guarantee the best values in terms of energy efficiency' saw the producer describe the window material. While the consumer may assume that the use of these materials leads to energy efficiency, nothing on the website explained what those 'best values' were. The information was incomplete – and no further details were received in response to an email.

One claim declared an airline to have the best environmental performance in Europe. Comparison data with other EU airlines were embedded in the company's annual reports but consumers would need to undertake substantial research on its website and to find/request data from other EU airlines in order to compare CO_2 emissions. The annual reports provided data related to financial years in comparison with different financial year or calendar year datasets of other airline companies and such datasets are not fully referenced, making them only indirectly accessible to consumers. Also, not all EU airlines seemed to be included in the comparison. The data provided to substantiate the claim were thus considered incomplete and inconclusive.

Very poor information was provided in an advertisement on eggs that informed consumers that the eggs were GMO-free. The producer's website simply stated that the chickens were fed with GMO-free feed, but nothing more. No detailed information was available on the verification and/or supervision of the producer's feed, there was no mention of third-party verified testing of the feed or supervision of the production. The company might follow its own internal policy, but this was not made explicit.

Some other claims had deeper substantiation, giving the impression of truth but omitting more persuasive explanations of the data. This was the case for a t-shirt made of '50% recycled polyester'. The company's webpage dedicated to recycled polyester specified that instead of producing new polyester from oil, the polyester used was created from used plastics such as bottles. The website noted the environmental advantages of recycled polyester, such as a 20-60% reduction in environmental impact compared to new polyester. However, the impacts and percentages were not clarified.

The claim 'CO_2-compensated' was another such example (ground coffee). The company explained on its webpages that it calculated the climate impact of the coffee production, all the way down to the level of an individual product or bag of coffee, and that it compensated for 100% of the remaining environmental impact from the coffee production by purchasing climate-compensation (or offset) certificates. It also noted that the calculation of CO_2 emissions covered the product lifecycle 'from the farms to the store shelves', giving the impression that the claim covered the whole lifecycle of the product. However, these failed to consider packaging and related environmental impacts. The company provided no detailed information on the climate-compensation certificates it claimed to buy to compensate the environmental impact related to its coffee production.

Some claims looked very ambitious and any substantiation thus seemed insufficient. For apples, there was a claim, 'we are committing!' [to the preservation of biological sustainability]. The advertisement itself provided no further substantiation. The company's website contained information on the claims in the advertisement but provided only limited substantiating evidence. For instance, the consumer found no information on whether or not artificial pesticides were applied to the particular product. The company stated its commitment to ensuring that the products are '100% approved' by an independent organisation but gave no indication of the theme of such an approval scheme, the criteria for obtaining approval, or the type of organisation that would provide the approval.

Lack of clear link between claim and substantiation

For certain claims, substantiating information was found through the producer's website or the internet, but the link between the use of a technology/method and a certain type of effect was missing. For example, one claim stated that use of a specific technology in a washing machine led to water and energy saving. Although this was repeated on the website, together with numbers and assumptions about different programmes and load weight, the website did not completely link the figures and energy saving with the technology and it was unclear which programmes led to energy and water saving. Although there was some attempt at substantiation, it was too limited to entirely confirm the claim. Another example related to sugar, which was described as 'sweet from nature from local crops'. The website stated that the sweetness of sugar came exclusively from nature. It described investments to minimise negative environmental impacts but gave no information to suggest that it uses exclusively natural methods for manufacturing its products. No information was found to substantiate the claim that the product came from local crops.

Difficult to find substantiation

In some cases, claims may be substantiated, but finding this information was difficult. For instance, a claim an egg-box was made from recycled material required significant substantiation: in order to establish if the claim was true and the percentage of the box made of recycled material, the expert needed to contact the producer of the eggs, which then provided the details of the producer of the box. The website of the box's producer substantiated the claim.

The lack of substantiation on the producer's website can lead consumers to believe that a claim is not true, even if 'technically' it is true. A claim in a washing machine powder containing the term 'bio' in its name required a basic knowledge of biological detergents, coupled with a search for the ingredients and safety data sheet of the product - information that was not available on either the reseller's nor the carrier/producer's websites. Similarly, for a claim on a car brand with the term 'eco' on the name or that uses an specific technology containing the term 'eco' on the name, desk research was needed to understand what the technology was, but neither the brochure nor website provided clear information on the term, or cross-referenced non-existent websites.

Further commitments

Some claims related to future commitments of the company. For a path towards net-zero claim, for example, the airline's website specified its commitments, including ongoing and planned projects. Substantiation was considered sufficient in these cases.

3.2.2.4 Impact of Product Environmental Footprint Category Rules on assessment of claims

The challenge of authenticating claims through clear and consistent assessment methodologies has been underlined by consumers, producers and authorities and is now the focus of possible EU action requiring the use of uniform approaches to assessing and substantiating environmental claims (see Section 1).

The UCPD guidance notes that 'an environmental claim should relate to aspects that are significant in terms of the product's environmental impact' and that '…claims should be clear and unambiguous regarding which aspect of the product or its lifecycle they refer to". It also points out that if a trader only highlights one of several impacts when making an environmental claim, the claim could be considered misleading under the UCPD. The guidance refers to the use of lifecycle environmental performance of products and organisations, referencing also the Commission's PEF and OEF methods.

While PEFs spanning the entire lifecycle of products and services are not a new concept, a multitude of different methods were previously used to measure impacts, leading to confusion. A series of Commission PEF pilots have been established and tested, mapping PEFs and setting out Product Environmental Footprint Category Rules (PEFCRs) covering all steps in the lifecycle, from the extraction of raw materials, through production and use, to final waste management[58]. With regard to the products covered by this study, PEFCRs have been finalised for:

- Laptops (storage only)
- Washing machine detergents (heavy-duty liquids only)
- Paints
- Wine
- Lager pils
- Bottled water (unflavoured)
- Spaghetti pasta (dry wheat pasta)
- Whole milk (cows' milk only)
- Footwear (leather as intermediate product only)

An analysis was carried out to better understand how the PEFCRs would likely impact the assessment of environmental claims as misleading or not under the UCPD. A sample of claims was assessed further to understand 1) whether claims actually address the key environmental impacts and life-cycle stages of a given product type; and 2) whether any claims assessed as 'not misleading' by the national legal experts might be considered misleading when compared in a more detailed way against the information in the PEFs.

As the products in the sample did not carry out a PEF analysis, the claims are not necessarily expected to be in line with the information contained in the PEFCRs. PEFCRs are quite detailed and require a certain amount of product-specific as well as environmental expertise to fully understand and link to an environmental claim - the

national legal experts carrying out the in-depth assessments of 150 claims for this study were not asked to take this detail into account. This exercise can only be considered hypothetical due to the small number of claims from the in-depth analysis sample falling under the pilot PEFCRs (31 claims)[59], the fact that only publicly-available data was used and considering that claims were not expected to be based on PEF studies.

Findings

Claims addressing PEF 'hotspots'

PEF 'hotspots' refer to the environmental impacts, life-cycle stages and processes of a product that are most important from an environmental perspective and are identified in a PEFCR[60]. In theory, if a claim refers to an element not identified as being significant, or only partially refers to an element identified as significant, this could lead to the claim being irrelevant or a 'misleading omission'. All 31 claims on products covered by the PEFCRs were reviewed; six of these made no reference to a lifecycle stage or to specific environmental impacts.

Several of the claims clearly referred to the environmental impact addressed, and these did correspond to the impacts set out in the PEFCRs. For example, 'manufactured climate-neutrally' (washing machine detergents), and 'net-zero climate footprint' (whole milk) all clearly referred to climate change, while '100% recycled plastic bottles' (washing machine detergents) and a less direct claim concerning a water bottle lid that will not get lost and can therefore be recycled (bottled water) impacts the end-of-life of the packaging. Climate change is identified as a relevant environmental impact in the PEFCR on detergents and dairy, whilst the recycling of the cap was identified as having only a small impact compared to the recycling of the bottle itself in the PEFCR on packed water.

One claim linked to washing machine detergents did not address the main impacts or lifecycle stages identified in the PEF (which relate to ingredients (chemical sourcing and manufacturing) and their use), but instead claimed to increase the longevity of clothes, thus reducing the need to buy new ones. This claim was assessed as clear, not ambiguous, accurate and substantiated, but focused on durability of clothing, and could be considered misleading under the UCPD, as it fails to address the main impacts of the product.

Claims deemed misleading vis-à-vis existing PEFCRs

Claims assessed as 'not misleading' by the national legal experts in the in-depth analysis were further reviewed to see whether they could potentially be considered misleading when taking the PEFCRs into account. The pool of relevant claims for the assessment was small: only 9 claims previously assessed as 'not misleading' were relevant for the PEFCRs. Claims associated with an established ecolabel, where typically life cycle assessment studies are one of the inputs for defining criteria, are expected to remain relevant if a 'PEF lens' is applied. Other general claims, for example one claiming to be

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[59] Not all claims within the relevant product categories were covered under PEFs. For example, the washing machine detergent PEF only covers liquid heavy-duty detergent; laptops only cover storage; pasta only covers wheat pasta, etc.

[60] https://ec.europa.eu/environment/eussd/smgp/PEFCR_OEFSR_en.htm

'eco' (wine) and another that 'we think of nature' (whole milk) were less clear. While the analysis did not cover all possible information that might be available to verify this assumption, it is possible the products would not comply completely with the PEFCRs and the claims should therefore be considered misleading.

Two other potentially relevant examples of cases where the PEFCRs could reverse the national legal experts' assessments were found. A claim that a laundry detergent was manufactured climate neutrally was assessed as 'not misleading' as it was clear, not ambiguous, accurate, and substantiated. However, looking at the PEFCR for laundry detergent, it is clear that climate concerns are considered in multiple life-cycle stages, not just manufacturing. Furthermore, according to the PEF, offsetting has to be reported separately (in this case, tree-planting is specifically mentioned as one of the ways the company offsets their climate impacts). Another consideration is that the PEF should consider all impacts. Therefore, while the claim can be considered accurate, when comparing it to the PEFCR there are some possible misleading omissions with regard to other impacts and some doubts about the relevance of the claim.

Another example concerns a claim for 'natural leather' (footwear). The PEFCR differentiates between organic and mineral tanning, with the assumption that organic tanning is more 'natural'. There is no evidence that the product is treated using this process (although since the PEFCR notes that 75% of such products use synthetic tanning, statistically it is unlikely). No further information was available to determine whether the claim can be considered 'misleading' in light of the PEFCR, as it was not possible to establish what exactly made the leather 'natural'. It was however noted that the PEFCR only covers leather derived from animals slaughtered for human consumption, whereas the product website made it clear the leather used in the products did not come from endangered animals – this seems an odd claim to make if, as stated in the PEFCR, 99% of leather products worldwide are from adult bovine hides, calf, ovine and caprine skins. Further information is needed to ascertain whether this claim, used as substantiation for the claim assessed, is misleading.

Conclusions

Despite the small sample size, the exercise yielded some conclusions. First, many claims are very general, and it is not very easy to relate them to the information in the PEFCRs without considerable product knowledge, scientific expertise, and study. This is beyond the capacity of the average or even educated consumer. Given that there are many environmental hotspots per product type, there is a high probability that specific claims coincide with at least one of them, even coincidentally.

Claims that aim to persuade a consumer that by purchasing such a product they are having a positive impact on environmental sustainability could be considered a misleading commercial practice under the terms of the UCPD, particularly where the consumer is not aware of the product's other key impacts.

There are, however, a few cases where claims indeed concerned issues relevant for environmental sustainability, but these were minor compared to either 1) the harm a product is also causing; or 2) other products that address their key impacts. Only one clear case was found when a claim had a potentially misleading omission by only referring to impacts during one life-cycle stage.

Finally, the exercise identified two cases where claims that were considered by the national legal experts as not misleading could be considered misleading when considering the PEFCRs.

3.3 Overall lessons from the in-depth analysis

The in-depth analysis led to some interesting overall observations about the nature of environmental claims and the ways in which they can be considered misleading, according to the legislation in place. The work builds on previous analysis carried out for the European Commission in 2014[61]. For this study, a random selection of 53 textual and logo claims on non-food products were assessed using a similar methodology. The study found that few of the claims could be considered 100% in line with the UCPD, mostly due to the use of vague terminology that could be considered subjectively misleading.

The current assessment, which is larger in scope, generally corroborated this finding, along with some of the other key conclusions from that work. A synthesis of useful observations and lessons from the in-depth assessment is presented below.

Vague claims that are otherwise valid

As presented in Section 3.2.2.1, just over one-third of the claims were considered by the experts to be unclear and ambiguous, i.e. they could not discern the nature of the actual environmental benefit promoted by the claim. Many of the claims assessed as unclear were vague, general statements which, on first impression, could not be associated with any concrete environmental impact. Several of these claims were eventually assessed as accurate and substantiated, when, upon further investigation, national experts were satisfied with the information provided by the trader/producer. Nevertheless, this is in line with the UCPD guidance[62], where such claims can be considered potentially misleading (and they were categorised as such in the analysis).

This leads to several possible conclusions. One is that there may be a gap in awareness among traders/producers, where they do not realise that the use of catchy vague statements may be misleading, despite having a valid, verifiable claim. This issue was also pointed out in the 2014 study, which noted cases where traders and/or producers were potentially ignorant of the rules rather seeking to deliberately mislead consumers.

Determining whether or not a claim is clear is not always straightforward. In some cases, very similar claims were assessed as clear/unclear by different experts. Examples included the claim 'we are working together with nature' (apples) and 'we think of nature' (whole milk), where the first was seen as unclear and inaccurate and the second was seen (by a different expert) as clear and accurate. This could imply the need for more specific rules on what is considered clear, especially as this could cause an otherwise acceptable claim to be considered misleading under the UCPD.

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[61] GfK et al, *Consumer market study on environmental claims for non-food products,* for the European Commission DG Justice and Consumers, July 2014.

[62] According to the guidance, based on the general clauses of the UPCD, particularly Articles 6 and 7, 'traders must present their green claims in a clear, specific, accurate and unambiguous manner, to ensure that consumers are not mislead…Environmental claims can be misleading if they are based on vague and general statements of environmental benefits…'.

Key role of certification

An overall conclusion is that certification schemes (e.g. bioleaf, EU ecolabel, etc.) greatly improved the clarity of the claims. Certification by an independent, third-party institution is very helpful for the assessment of all the criteria (e.g. 'Eco' organic waste rubbish bag' in 2372, rubbish bags). However, the increasing proliferation of schemes, logos and labels may confuse consumers. Indeed, some producers have developed their own logos or certificates (e.g. the PFC free logo in 1156, clothing), which may be particularly problematic, especially where producers do not provide sufficient substantiation (e.g. '50% recycled polyester' (1828, clothing), where the logo seems to be decorative).

Respondents to the recent public consultation on the EU product policy framework[63] reported concerns about the number of labels and difficulties in understanding what they meant and how they compare with one another. For certification to work, common standards must be followed and consumers must know what they can expect from certain logos, labels or certificates.

A related aspect is ensuring that consumers are sufficiently informed and educated on recognising and interpreting environmental certificates and labels. The in-depth analysis found that claims are reinforced when the certification/label is clearly explained on the website (e.g. the OEKO-TEX logo in 35, baby nappies).

Different approaches to substantiation

Substantiation of environmental claims is not only a legal requirement. Done properly, it really helps producers to inform consumers that they are indeed achieving what they claim. Around 60% of the claims analysed in-depth were found to be well-substantiated by the national experts, leading to the identification of some good practices and lessons learned for others.

Claims were generally assessed as substantiated when producers used clear language and provided further links to complete the information. For example, the airline claiming 'flightpath net-zero' (1641, airlines) provided clear visual information on its efforts to reduce CO_2, together with links to complete the information, including explanations of its specific projects. The same was true for producers providing independent studies that explain or back-up their claims. The website of the producer claiming, that chicken only has one-tenth of the beef's climate effect (poultry) included links to two independent studies, one from the Swedish Food Agency and another from WWF, backing up its claim. This works even better when some degree of substantiation is provided on the packaging of the product itself - even if this is basic - and a link to further information. This was the case for the claim '-56% smaller carbon footprint' (tomatoes), where the advertisement itself provided a link to a study supporting the claim.

By contrast, when a producer tried to substantiate the claim but this was rather basic and incomplete, national experts were even more likely to distrust the claim and consider it merely a commercial strategy. For example, the claim 'certified GMO-free' (spaghetti pasta) was considered misleading because research showed that it was the eggs used

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[63] Milieu Consulting, *Support for the upcoming Commission Initiative towards an EU product policy framework supportive of Circular Economy: Draft report on open public consultation,* for the European Commission DG Environment, February 2019.

that were actually certified GMO-free (the logo is similar but not identical to that of the 'certifying organisation') .

Another important issue is that substantiation of the claim (at least online) is not always in the language of the country where the product is sold. For example, a buyer of a window boasting 'best values in terms of energy efficiency' in Spain will likely not understand what these 'best values' are, because the seller's website in Spain does not provide this information online and the producer's website is in German. Another example was the claim 'made of recycled polyester (86% recycled polyester)' (clothing: sportswear women) sold in Greece. Part of the substantiation (link from the producer's website) was in English or German, and not in Greek.

The PEF is an interesting concept, with good potential for standardisation of the approach to environmental claims for specific groups of products available on the EU single market. Italy has put forward the 'Made Green in Italy' initiative, which aims to use the Commission's PEF methods as the basis for a national environmental labelling scheme. The scheme aims to facilitate consumers' making informed decisions to promote sustainable development. The scheme adopts the PEF method and includes additional aspects (traceability, environmental quality, landscape quality and social sustainability)[64]. The LIFE-funded Magis project is promoting the scheme and aims to facilitate a wider uptake of PEF in Italy and Europe.

While the in-depth assessments carried out for this study did not go into sufficient technical detail to determine the extent to which the substantiation provided by producers was completely in line with the PEFs, an analysis of selected examples showed that they have the potential to highlight cases where environmental claims fail to address a product's main environmental impacts, stages or processes or provide detailed information about a product that an educated consumer would fail to recognise.

Comparing environmental claims

According to the UCPD guidance[65], products bearing comparisons should be assessed against similar products. It is equally important that the products belong to the same product category and that the method used to produce the information is consistent, i.e. that the same methodological choices and rules are applied and that the results are replicable.

The in-depth analysis showed that claims that offer gradation ('the best', 'more', 'x times more efficient') often lack any indication of the benchmark for comparison, automatically rendering them inaccurate and misleading. Examples included a claim stating that an airline had the best environmental performance in Europe and 'more welfare' (poultry). Some other claims offer more concrete comparisons but information on the methodology of the calculations is lacking. An illustrative example of such a misleading claim was the advertisement of fuel use by a hybrid car: '10 times less than a petrol car', where neither the advertisement nor the producer's website provided any details on the methodology to calculate this range of savings.

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[64] https://www.minambiente.it/pagina/made-green-italy
[65] UCPD guidance, Section 5.1.7.

ANNEXES

Annex I: Completed mystery shopping assessments

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across Europe
Total	2600	67	79	108	62	110	62	54	93	102	77	80	75	122	106	98	10
Non-food products	1362	37	55	52	29	64	34	18	51	36	34	52	51	82	44	37	10
Consumer electronics	32	0	0	4	0	0	0	0	4	0	0	4	0	4	0	0	0
Mobile phones	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laptops	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Televisions	32	0	0	4	0	0	0	0	4	0	0	4	0	4	0	0	0
Household appliances	32	0	0	4	0	0	4	0	0	0	4	0	0	0	0	4	0
Washing machines	32	0	0	4	0	0	4	0	0	0	4	0	0	0	0	4	0
Refrigerators	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Coffee machines	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Textiles	264	12	12	0	12	12	0	0	12	12	12	0	12	12	12	12	0
Clothing: Sportswear women	144	0	12	0	12	0	0	0	12	0	0	0	12	12	12	0	0
Footwear men size 42	120	12	0	0	0	12	0	0	0	12	12	0	0	0	0	12	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across
Household cleaning and storing products	384	4	22	22	0	22	4	0	22	4	0	22	22	26	22	0	0
Washing machine detergents	352	0	22	22	0	22	0	0	22	0	0	22	22	22	22	0	0
Rubbish bags	32	4	0	0	0	0	4	0	0	4	0	0	0	4	0	0	0
Personal hygiene and beauty products	96	4	4	4	0	0	4	4	4	4	4	0	4	4	4	4	0
Shampoos	32	0	4	0	0	0	4	0	0	0	0	0	4	0	4	0	0
Skin creams	32	0	0	4	0	0	0	0	4	0	4	0	0	4	0	0	0
Toilet paper	32	4	0	0	0	0	0	4	0	4	0	0	0	0	0	4	0
Baby products	64	4	4	0	0	4	4	0	0	4	0	0	4	4	0	4	0
Baby bottles	32	0	4	0	0	0	4	0	0	4	0	0	0	0	0	4	0
Baby diapers	32	4	0	0	0	4	0	0	0	0	0	0	4	4	0	0	0
Miscellaneous Household	246	4	4	12	7	20	12	4	4	4	4	16	4	20	0	8	0
Paints	120	0	0	12	0	12	12	0	0	0	0	12	0	12	0	0	0
Windows	32	0	4	0	0	4	0	0	0	0	4	0	0	0	0	4	0
Hardwood floors	30	0	0	0	3	0	0	0	4	0	0	0	4	4	0	0	0
Carpets	32	4	0	0	0	4	0	0	0	0	0	4	0	0	0	4	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across Europe
Shower heads	32	0	0	0	4	0	0	4	0	4	0	0	0	4	0	0	0
Transport	100	3	3	1	5	2	1	6	1	3	5	5	1	7	1	1	10
Passenger vehicles	30	0	0	0	4	0	0	4	0	0	0	3	0	4	0	0	0
Airlines	70	3	3	1	1	2	1	2	1	3	5	2	1	3	1	1	10
Financial services	80	3	3	3	3	2	3	2	2	3	3	3	2	3	3	2	0
Consumer investment products	80	3	3	3	3	2	3	2	2	3	3	3	2	3	3	2	0
Other services	64	3	3	2	2	2	2	2	2	2	2	2	2	2	2	2	0
Hotels	32	2	1	1	1	1	1	1	1	1	1	1	1	1	1	1	0
Household electricity services	32	1	2	1	1	1	1	1	1	1	1	1	1	1	1	1	0
Food	1238	30	24	56	33	46	28	36	42	66	43	28	24	40	62	61	0
Beverages	440	14	8	22	14	4	12	16	22	12	26	12	4	16	4	34	0
Wine	100	14	0	0	0	0	12	0	0	12	0	0	0	0	0	12	0
Lager Pils	32	0	4	0	0	4	0	0	0	0	0	0	4	4	0	0	0
Ground coffee	176	0	0	22	0	0	0	0	22	0	22	0	0	0	0	22	0
Bottled water	100	0	0	0	14	0	0	12	0	0	0	12	0	12	0	0	0
Orange juice	32	0	4	0	0	0	0	4	0	0	4	0	0	0	4	0	0
Cereals and cereal products	210	0	4	7	4	22	0	4	4	22	0	4	4	4	22	4	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across Europe
Pre-packed bread	32	0	0	0	4	0	0	4	0	0	0	4	0	0	0	4	0
Spaghetti pasta	146	0	0	7	0	22	0	0	0	22	0	0	0	0	22	0	0
Rice	32	0	4	0	0	0	0	0	4	0	0	0	4	4	0	0	0
Dairy and eggs	94	0	4	3	0	4	0	0	4	12	4	0	0	0	12	4	0
Whole milk	62	0	0	3	0	0	0	0	4	12	0	0	0	0	12	0	0
Eggs	32	0	4	0	0	4	0	0	0	0	4	0	0	0	0	4	0
Fats and oils	92	4	0	4	4	4	3	0	4	4	0	4	4	4	4	3	0
Margarine	32	0	0	0	4	0	0	0	4	4	0	0	0	4	0	0	0
Olive oil	32	4	0	0	0	4	0	0	0	0	0	4	0	0	4	0	0
Sunflower oil	28	0	0	4	0	0	3	0	0	0	0	0	4	0	0	3	0
Fruits	94	0	4	4	3	0	4	4	4	0	4	4	4	4	4	4	0
Apples	32	0	0	4	0	0	0	0	4	0	0	0	4	4	0	0	0
Bananas	32	0	4	0	0	0	0	4	0	0	4	0	0	0	4	0	0
Oranges	30	0	0	0	3	0	4	0	0	0	0	4	0	0	0	4	0
Meat	64	0	4	4	0	4	0	4	0	4	4	0	0	4	4	0	0
Poultry meat (raw & unprocessed)	32	0	0	4	0	0	0	4	0	4	0	0	0	0	4	0	0
Beef (raw & unprocessed)	32	0	4	0	0	4	0	0	0	0	4	0	0	4	0	0	0
Pre-prepared meals	88	4	0	4	4	4	3	4	0	4	1	0	4	4	4	4	0
Lasagne	26	4	0	0	0	0	0	4	0	0	1	0	0	0	0	4	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across
Soup (in Tetrapak)	30	0	0	4	0	0	3	0	0	4	0	0	0	4	0	0	0
Pizza	32	0	0	0	4	4	0	0	0	0	0	0	4	0	4	0	0
Sugar	60	4	0	4	0	4	2	0	0	4	4	0	0	0	4	4	0
Cane sugar	32	4	0	0	0	4	0	0	0	4	0	0	0	0	0	4	0
Granulated white sugar	28	0	0	4	0	0	2	0	0	0	4	0	0	0	4	0	0
Sugar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Vegetables	96	4	0	4	4	0	4	4	4	4	0	4	4	4	4	4	0
Tomatoes	32	4	0	0	0	0	0	4	0	0	0	0	4	0	4	0	0
Canned beans	32	0	0	4	0	0	4	0	0	4	0	0	0	0	0	4	0
Potatoes	32	0	0	0	4	0	0	0	4	0	0	4	0	4	0	0	0

Annex II: Completed advertisement assessments

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across Europe
Total	1616	151	144	70	96	91	103	88	69	183	128	41	70	95	118	169	0
Non-food products	808	61	79	43	38	54	44	68	17	77	56	31	50	75	51	64	0
Consumer electronics	144	5	31	0	0	5	5	26	0	5	31	0	0	26	5	5	0
Mobile phones	20	5	0	0	0	0	5	0	0	5	0	0	0	0	0	5	0
Laptops	20	0	5	0	0	5	0	0	0	0	5	0	0	0	5	0	0
Televisions	104	0	26	0	0	0	0	26	0	0	26	0	0	26	0	0	0
Household appliances	60	0	5	5	5	5	5	5	0	5	5	0	5	5	5	5	0
Washing machines	20	0	0	5	0	0	5	0	0	0	5	0	0	0	0	5	0
Refrigerators	20	0	5	0	0	0	0	5	0	5	0	0	0	5	0	0	0
Coffee machines	20	0	0	0	5	5	0	0	0	0	0	0	5	0	5	0	0
Textiles	120	15	0	0	15	5	0	18	2	30	0	5	0	15	0	15	0
Clothing: Sportswear women	60	0	0	0	15	5	0	3	2	15	0	5	0	15	0	0	0
Footwear men size 42	60	15	0	0	0	0	0	15	0	15	0	0	0	0	0	15	0
Household cleaning and storing	124	9	26	0	2	26	1	1	0	6	0	0	27	0	0	26	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across
products																	
Washing machine detergents	104	0	26	0	0	26	0	0	0	0	0	0	26	0	0	26	0
Rubbish bags	20	9	0	0	2	0	1	1	0	6	0	0	1	0	0	0	0
Personal hygiene and beauty products	60	5	5	5	0	0	5	5	5	5	5	0	5	5	5	5	0
Shampoos	20	0	5	0	0	0	5	0	0	0	0	0	5	0	5	0	0
Skin creams	20	0	0	5	0	0	0	0	5	0	5	0	0	5	0	0	0
Toilet paper	20	5	0	0	0	0	0	5	0	5	0	0	0	0	0	5	0
Baby products	40	11	4	0	3	0	6	0	0	2	1	3	5	5	0	0	0
Baby bottles	20	6	4	0	3	0	1	0	0	2	1	3	0	0	0	0	0
Baby diapers	20	5	0	0	0	0	5	0	0	0	0	0	5	5	0	0	0
Miscellaneous Household	80	8	0	15	0	5	4	0	2	16	6	0	0	6	18	0	0
Paints	60	0	0	15	0	5	4	0	2	16	0	0	0	0	18	0	0
Windows	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hardwood floors	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Carpets	20	8	0	0	0	0	0	0	0	0	6	0	0	6	0	0	0
Shower heads	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Transport	80	4	4	4	9	4	4	9	4	4	4	9	4	9	4	4	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across
Passenger vehicles	20	0	0	0	5	0	0	5	0	0	0	5	0	5	0	0	0
Airlines	60	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	0
Financial services	60	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	0
Consumer investment products	60	4	4	4	4	4	4	4	4	4	4	4	4	4	4	4	0
Other services	40	0	0	10	0	0	10	0	0	0	0	10	0	0	10	0	0
Hotels	20	0	0	5	0	0	5	0	0	0	0	5	0	0	5	0	0
Household electricity services	20	0	0	5	0	0	5	0	0	0	0	5	0	0	5	0	0
Food	808	90	65	27	58	37	59	20	52	106	72	10	20	20	67	105	0
Beverages	264	35	5	0	26	22	3	15	26	30	31	0	5	5	5	56	0
Wine	60	15	0	0	0	15	0	0	0	15	0	0	0	0	0	15	0
Lager Pils	20	0	5	0	0	5	0	0	0	0	0	0	5	5	0	0	0
Ground coffee	104	0	0	0	26	0	0	0	26	0	26	0	0	0	0	26	0
Bottled water	60	15	0	0	0	0	0	15	0	15	0	0	0	0	0	15	0
Orange juice	20	5	0	0	0	2	3	0	0	0	5	0	0	0	5	0	0
Cereals and cereal products	144	0	32	0	5	5	26	0	5	26	5	5	0	0	21	14	0
Pre-packed bread	20	0	0	0	5	5	0	0	0	0	0	5	0	0	0	5	0
Spaghetti pasta	104	0	27	0	0	0	26	0	0	26	0	0	0	0	21	4	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across
Rice	20	0	5	0	0	0	0	0	5	0	5	0	0	0	0	5	0
Dairy and eggs	80	0	5	15	0	4	9	0	7	20	0	0	0	0	15	5	0
Whole milk	60	0	0	15	0	3	7	0	5	15	0	0	0	0	15	0	0
Eggs	20	0	5	0	0	1	2	0	2	5	0	0	0	0	0	5	0
Fats and oils	60	12	3	0	5	1	5	0	9	2	3	0	5	7	5	3	0
Margarine	20	5	0	0	5	0	0	0	5	0	0	0	0	5	0	0	0
Olive oil	20	5	0	0	0	0	5	0	0	0	0	0	5	0	5	0	0
Sunflower oil	20	2	3	0	0	1	0	0	4	2	3	0	0	2	0	3	0
Fruits	60	10	11	1	0	0	0	0	0	10	8	0	10	6	0	4	0
Apples	20	0	8	0	0	0	0	0	0	0	0	0	6	6	0	0	0
Bananas	20	6	2	0	0	0	0	0	0	5	3	0	4	0	0	0	0
Oranges	20	4	1	1	0	0	0	0	0	5	5	0	0	0	0	4	0
Meat	40	3	1	5	16	0	5	0	0	5	0	0	0	0	5	0	0
Poultry meat (raw & unprocessed)	20	0	0	5	0	0	5	0	0	5	0	0	0	0	5	0	0
Beef (raw & unprocessed)	20	3	1	0	16	0	0	0	0	0	0	0	0	0	0	0	0
Pre-prepared meals	60	12	0	0	5	0	1	5	5	0	12	5	0	2	6	7	0
Lasagne	20	5	0	0	0	0	0	5	0	0	5	0	0	0	1	4	0
Soup (in Tetrapak)	20	7	0	0	0	0	1	0	0	0	7	0	0	2	0	3	0
Pizza	20	0	0	0	5	0	0	0	5	0	0	5	0	0	5	0	0
Sugar	40	5	5	0	0	5	5	0	0	7	3	0	0	0	5	5	0

	Total	Western Europe				Eastern Europe				Southern Europe				Northern Europe			
		France	Germany	Ireland	Netherlands	Czechia	Poland	Romania	Hungary	Italy	Spain	Portugal	Greece	Denmark	Sweden	Finland	Across Europe
Cane sugar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Granulated white sugar	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sugar	40	5	5	0	0	5	5	0	0	7	3	0	0	0	5	5	0
Vegetables	60	13	3	6	1	0	5	0	0	6	10	0	0	0	5	11	0
Tomatoes	20	5	0	0	1	0	0	0	0	1	3	0	0	0	0	10	0
Canned beans	20	3	0	2	0	0	5	0	0	2	3	0	0	0	4	1	0
Potatoes	20	5	3	4	0	0	0	0	0	3	4	0	0	0	1	0	0

Annex III: Completed assessments by type of advertisement

	Print	TV	Radio	Online banner	Digital video
Total	534	459	23	575	25
Non-food products	226	195	18	363	6
Consumer electronics	37	13	3	91	0
Mobile phones	5	6	1	8	0
Laptops	5	4	1	10	0
Televisions	27	3	1	73	0
Household appliances	17	12	1	30	0
Washing machines	6	6	0	8	0
Refrigerators	5	2	0	13	0
Coffee machines	6	4	1	9	0
Textiles	41	8	1	70	0
Clothing: Sportswear women	21	5	0	34	0
Footwear men size 42	20	3	1	36	0
Household cleaning and storing products	40	68	0	16	0
Washing machine detergents	33	57	0	14	0
Rubbish bags	7	11	0	2	0
Personal hygiene and beauty products	23	21	1	15	0
Shampoos	10	5	0	5	0
Skin creams	10	6	1	3	0
Toilet paper	3	10	0	7	0
Baby products	19	9	0	11	1

	Print	TV	Radio	Online banner	Digital video
Baby bottles	10	5	0	4	1
Baby diapers	9	4	0	7	0
Miscellaneous Household	4	26	3	42	5
Paints	3	25	0	27	5
Windows	0	0	0	0	0
Hardwood floors	0	0	0	0	0
Carpets	1	1	3	15	0
Shower heads	0	0	0	0	0
Transport	21	20	6	33	0
Passenger vehicles	6	4	2	8	0
Airlines	15	16	4	25	0
Financial services	17	12	3	28	0
Consumer investment products	17	12	3	28	0
Other services	7	6	0	27	0
Hotels	2	2	0	16	0
Household electricity services	5	4	0	11	0
Food	308	264	5	212	19
Beverages	103	82	2	77	0
Wine	50	4	1	5	0
Lager Pils	8	8	0	4	0
Ground coffee	15	35	0	54	0
Bottled water	26	20	1	13	0
Orange juice	4	15	0	1	0
Cereals and cereal products	62	40	0	39	3
Pre-packed bread	8	6	0	6	0

	Print	TV	Radio	Online banner	Digital video
Spaghetti pasta	43	26	0	32	3
Rice	11	8	0	1	0
Dairy and eggs	28	28	0	24	0
Whole milk	14	26	0	20	0
Eggs	14	2	0	4	0
Fats and oils	15	36	0	7	2
Margarine	5	12	0	3	0
Olive oil	3	15	0	2	0
Sunflower oil	7	9	0	2	2
Fruits	23	21	1	14	1
Apples	10	7	1	2	0
Bananas	8	5	0	7	0
Oranges	5	9	0	5	1
Meat	12	11	1	16	0
Poultry meat (raw & unprocessed)	11	6	0	3	0
Beef (raw & unprocessed)	1	5	1	13	0
Pre-prepared meals	10	29	1	15	5
Lasagne	4	4	1	6	5
Soup (in Tetrapak)	5	15	0	0	0
Pizza	1	10	0	9	0
Sugar	23	3	0	13	1
Cane sugar	0	0	0	0	0
Granulated white sugar	0	0	0	0	0
Sugar	23	3	0	13	1
Vegetables	32	14	0	7	7
Tomatoes	17	1	0	0	2
Canned beans	6	7	0	2	5
Potatoes	9	6	0	5	0

Annex IV: Mandatory and voluntary ecolabelling schemes established by the EU and by national or regional public entities

Mandatory schemes (EU)

Product category	EU mandatory schemes
All	Green Dot
Mobile phones	
Laptops	
Televisions	EU Energy label
Washing machines	EU Energy label
Refrigerators	EU Energy label
Coffee machines	
Clothing: Sportswear women	Textile composition (Textile Regulation (EU) No 1007/2011)
Footwear men size 42	Materials used in footwear (relating to Directive 94/11/EC)
Washing machine detergents	Recommended dosages for washing machine detergents (Regulation (EC) No 648/2004)
Rubbish bags	
Shampoos	
Skin creams	
Toilet paper	
Baby bottles	
Baby diapers	
Paints	
Windows	
Hardwood floors	
Carpets	
Shower heads	
Passenger vehicles	Fuel efficiency and CO2 emissions of passenger vehicles (Directive 1999/94/EC)
Airlines	

Product category	EU mandatory schemes
Consumer investment products	
Hotels	
Household electricity services	
Wine	
Lager Pils	
Ground coffee	
Bottled water	
Orange juice	
Pre-packed bread	
Spaghetti pasta	
Rice	
Whole milk	
Eggs	Country of origin information (Regulation (EU) No 1169/2011)
Margarine	
Olive oil	Country of origin information (Regulation (EU) No 1169/2011)
Sunflower oil	
Apples	Country of origin information (Regulation (EU) No 1169/2011)
Bananas	Country of origin information (Regulation (EU) No 1169/2011)
Oranges	Country of origin information (Regulation (EU) No 1169/2011)
Poultry meat (raw & unprocessed)	Country of origin information (Regulation (EU) No 1169/2011)
Beef (raw & unprocessed)	Country of origin information (Regulation (EU) No 1169/2011)
Lasagne	
Soup (in Tetrapak)	
Pizza	

Product category	EU mandatory schemes
Cane sugar	
Granulated white sugar	
Sugar	
Tomatoes	Country of origin information (Regulation (EU) No 1169/2011)
Canned beans	Country of origin information (Regulation (EU) No 1169/2011)
Potatoes	Country of origin information (Regulation (EU) No 1169/2011)

Voluntary ecolabelling schemes established by the EU and by national or regional public entities

Product category	EU		DE	IE	NL	CZ	PL	RO	HU	IT	ES	PT	EL	DK	SE	FI
	EU Ecolabel	EU organic logo	Blue Angel	No legislated voluntary ecolabel	Milieukeur or PlanetProof	Ekologicky šetrný výrobek, Ekologicky šetrná služba	Polish Eco Mark	No legislated voluntary ecolabel	Hungarian Ecolabel	Made Green in Italy	Catalan Environmental Quality Guarantee	No legislated voluntary ecolabel	No legislated voluntary ecolabel	Nordic Swan	Nordic Swan	Nordic Swan
Mobile phones			X													
Laptops			X											X	X	X
Televisions	X													X	X	X
Washing machines														X	X	X
Refrigerators														X	X	X
Coffee machines			X													
Clothing: Sportswear women	X		X			X				X				X	X	X
Footwear men size 42	X		X							X				X	X	X
Washing machine detergents	X		X							X				X	X	X
Rubbish bags																
Shampoos	X		X						X							
Skin creams							X		X					X	X	X

Product category	EU		DE	IE	NL	CZ	PL	RO	HU	IT	ES	PT	EL	DK	SE	FI
	EU Ecolabel	EU organic logo	Blue Angel	*No legislated voluntary ecolabel*	Milieukeur or PlanetProof	Ekologicky šetrný výrobek, Ekologicky šetrná služba	Polish Eco Mark	*No legislated voluntary ecolabel*	Hungarian Ecolabel	Made Green in Italy	Catalan Environmental Quality Guarantee	*No legislated voluntary ecolabel*	*No legislated voluntary ecolabel*	Nordic Swan	Nordic Swan	Nordic Swan
Toilet paper																
Baby bottles																
Baby diapers																
Paints	X									X				X	X	X
Windows														X	X	X
Hardwood floors			X													
Carpets			X											X	X	X
Shower heads			X													
Passenger vehicles																
Airlines																
Consumer investment products																
Hotels	X				X									X	X	X
Household electricity services					X											

Product category	EU		DE	IE	NL	CZ	PL	RO	HU	IT	ES	PT	EL	DK	SE	FI
	EU Ecolabel	EU organic logo	Blue Angel	*No legislated voluntary ecolabel*	Milieukeur or PlanetProof	Ekologicky šetrný výrobek, Ekologicky šetrná služba	Polish Eco Mark	*No legislated voluntary ecolabel*	Hungarian Ecolabel	Made Green in Italy	Catalan Environmental Quality Guarantee	*No legislated voluntary ecolabel*	*No legislated voluntary ecolabel*	Nordic Swan	Nordic Swan	Nordic Swan
Wine		X								X				X Packaging only	X Packaging only	X Packaging only
Lager Pils		X								X				X Packaging only	X Packaging only	X Packaging only
Ground coffee		X														
Bottled water										X				X Packaging only	X Packaging only	X Packaging only
Orange juice		X												X Packaging only	X Packaging only	X Packaging only
Pre-packed bread		X														

Product category	EU		DE	IE	NL	CZ	PL	RO	HU	IT	ES	PT	EL	DK	SE	FI
	EU Ecolabel	EU organic logo	Blue Angel	*No legislated voluntary ecolabel*	Milieukeur or PlanetProof	Ekologicky šetrný výrobek, Ekologicky šetrná služba	Polish Eco Mark	*No legislated voluntary ecolabel*	Hungarian Ecolabel	Made Green in Italy	Catalan Environmental Quality Guarantee	*No legislated voluntary ecolabel*	*No legislated voluntary ecolabel*	Nordic Swan	Nordic Swan	Nordic Swan
Spaghetti pasta		X								X						
Rice		X														
Whole milk		X			X					X						
Eggs		X			X											
Margarine		X														
Olive oil		X														
Sunflower oil		X														
Apples		X														
Bananas		X														
Oranges		X														
Poultry meat (raw & unprocessed)		X														
Beef (raw & unprocessed)		X														
Lasagne		X														
Soup (in Tetrapak)		X														
Pizza		X														

Product category	EU		DE	IE	NL	CZ	PL	RO	HU	IT	ES	PT	EL	DK	SE	FI
	EU Ecolabel	EU organic logo	Blue Angel	*No legislated voluntary ecolabel*	Milieukeur or PlanetProof	Ekologicky šetrný výrobek, Ekologicky šetrná služba	Polish Eco Mark	*No legislated voluntary ecolabel*	Hungarian Ecolabel	Made Green in Italy	Catalan Environmental Quality Guarantee	*No legislated voluntary ecolabel*	*No legislated voluntary ecolabel*	Nordic Swan	Nordic Swan	Nordic Swan
Cane sugar		X														
Granulated white sugar		X														
Sugar		X														
Tomatoes		X			X											
Canned beans		X														
Potatoes		X			X											

Annex V: Average number of claims across the entire population of products & services

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims –	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Total	0.75	0.09	0.04	0.02	0.61	0.22	0.04	0.03	0.01	0.13	0.53	0.04	0	0	0.48
Non-food products	0.74	0.1	0.01	0.03	0.61	0.15	0.03	0	0.02	0.09	0.59	0.06	0	0.01	0.51
Consumer electronics	0.74	0.07	0	0	0.68	0.1	0.06	0	0	0.04	0.64	0	0	0	0.64
Mobile phones	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Laptops	0.3	0	0	0	0.3	0	0	0	0	0	0.3	0	0	0	0.3
Televisions	0.83	0.07	0	0	0.75	0.17	0.06	0	0	0.11	0.66	0.01	0	0	0.65
Household appliances	1.55	0.53	0	0	1.01	0.25	0.19	0	0	0.06	1.3	0.34	0	0	0.96
Washing machines	1.64	0.53	0	0	1.11	0.29	0.19	0	0	0.1	1.35	0.34	0	0	1.01
Refrigerators	0.7	0	0	0	0.7	0.1	0	0	0	0.1	0.6	0	0	0	0.6
Coffee machines	0.05	0	0	0	0.05	0.05	0	0	0	0.05	0	0	0	0	0
Textiles	0.13	0.07	0	0	0.06	0.01	0	0	0	0.01	0.12	0.07	0	0	0.05
Clothing: Sportswear women	0.17	0.05	0	0	0.12	0.01	0	0	0	0.01	0.15	0.05	0	0	0.11
Footwear men size 42	0.1	0.09	0	0	0.01	0.01	0	0	0	0.01	0.09	0.09	0	0	0
Household cleaning and storing products	0.81	0.06	0.01	0.07	0.66	0.22	0.03	0.01	0.04	0.13	0.6	0.03	0	0.03	0.53

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims –	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Washing machine detergents	0.92	0.1	0.02	0.14	0.64	0.33	0.06	0.01	0.07	0.17	0.59	0.04	0.01	0.07	0.47
Rubbish bags	0.64	0	0	0	0.64	0.06	0	0	0	0.06	0.57	0	0	0	0.57
Personal hygiene and beauty products	1.14	0.05	0.03	0.04	1.02	0.43	0.05	0.03	0.04	0.31	0.71	0	0	0	0.71
Shampoos	0.83	0.09	0.03	0	0.71	0.34	0.09	0.03	0	0.23	0.49	0	0	0	0.49
Skin creams	0.59	0	0	0	0.59	0.08	0	0	0	0.08	0.52	0	0	0	0.52
Toilet paper	2	0.06	0.06	0.11	1.76	0.88	0.06	0.06	0.11	0.64	1.13	0	0	0	1.13
Baby products	0.82	0	0	0.2	0.62	0.32	0	0	0.14	0.18	0.5	0	0	0.06	0.44
Baby bottles	0.12	0	0	0	0.12	0.03	0	0	0	0.03	0.09	0	0	0	0.09
Baby diapers	1.43	0	0	0.33	1.11	0.53	0	0	0.2	0.33	0.91	0	0	0.13	0.78
Misc. Household	0.29	0	0.01	0	0.27	0.03	0	0.01	0	0.02	0.26	0	0.01	0	0.26
Paints	0.22	0	0.07	0	0.15	0.05	0	0.04	0	0.01	0.17	0	0.03	0	0.14
Windows	0.5	0	0	0	0.5	0	0	0	0	0	0.5	0	0	0	0.5
Hardwood floors	0.5	0	0	0	0.5	0	0	0	0	0	0.5	0	0	0	0.5
Carpets	0.21	0	0	0	0.21	0.06	0	0	0	0.06	0.15	0	0	0	0.15
Shower heads	0.31	0	0	0	0.31	0	0	0	0	0	0.31	0	0	0	0.31
Transport	0.65	0.19	0	0	0.46	0.03	0	0	0	0.03	0.61	0.19	0	0	0.43
Passenger vehicles	0.8	0.38	0	0	0.42	0.03	0	0	0	0.03	0.77	0.38	0	0	0.4

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims –	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Airlines	0.5	0	0	0	0.5	0.04	0	0	0	0.04	0.45	0	0	0	0.45
Financial services	0.37	0	0	0	0.37	0.02	0	0	0	0.02	0.35	0	0	0	0.35
Consumer investment products	0.37	0	0	0	0.37	0.02	0	0	0	0.02	0.35	0	0	0	0.35
Other services	0.9	0	0	0	0.9	0.14	0	0	0	0.14	0.77	0	0	0	0.77
Hotels	0.23	0	0	0	0.23	0.03	0	0	0	0.03	0.2	0	0	0	0.2
Household electricity services	1.58	0	0	0	1.58	0.25	0	0	0	0.25	1.33	0	0	0	1.33

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims – logos/labels	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Total	0.75	0.09	0.04	0.02	0.61	0.22	0.04	0.03	0.01	0.13	1	0.04	0	0	0.48
Food	0.76	0.08	0.07	0	0.62	0.29	0.05	0.06	0	0.17	0.48	0.03	0	0	0.45
Beverages	0.67	0.03	0.06	0	0.59	0.2	0.03	0.05	0	0.12	0.48	0	0	0	0.48
Wine	0.48	0.03	0.03	0	0.42	0.15	0.03	0.03	0	0.1	0.32	0	0	0	0.32
Lager Pils	0.19	0	0.03	0	0.16	0.09	0	0.03	0	0.06	0.1	0	0	0	0.1
Ground coffee	0.84	0	0.06	0	0.78	0.29	0	0.06	0	0.23	0.55	0	0.01	0	0.55
Bottled water	1.11	0.1	0	0	1.01	0.23	0.1	0	0	0.13	0.88	0	0	0	0.88
Orange juice	0.76	0	0.16	0	0.6	0.22	0	0.16	0	0.06	0.54	0	0	0	0.54
Cereals and cereal products	0.65	0.04	0.11	0	0.5	0.28	0.04	0.11	0	0.13	0.36	0	0	0	0.36
Pre-packed bread	0.2	0	0	0	0.2	0.08	0	0	0	0.08	0.13	0	0	0	0.13
Spaghetti pasta	0.85	0	0.13	0	0.71	0.29	0	0.13	0	0.15	0.56	0	0	0	0.56
Rice	0.89	0.13	0.19	0	0.58	0.49	0.13	0.19	0	0.18	0.4	0	0	0	0.4
Dairy and eggs	1.05	0.1	0.13	0	0.83	0.53	0.08	0.11	0	0.33	0.52	0.01	0.02	0	0.49
Whole milk	0.71	0	0.1	0	0.62	0.24	0	0.07	0	0.17	0.47	0	0.03	0	0.45
Eggs	1.39	0.19	0.16	0	1.04	0.82	0.17	0.16	0	0.49	0.57	0.03	0	0	0.54
Fats and oils	0.96	0.03	0.11	0	0.81	0.27	0.02	0.11	0	0.13	0.69	0.01	0	0	0.68
Margarine	0.9	0	0.03	0	0.87	0.09	0	0.03	0	0.06	0.81	0	0	0	0.81
Olive oil	1.08	0.09	0.24	0	0.75	0.41	0.06	0.24	0	0.11	0.67	0.03	0	0	0.64
Sunflower oil	0.92	0	0.07	0	0.85	0.28	0	0.07	0	0.22	0.63	0	0	0	0.63
Fruits	0.88	0.14	0.05	0	0.7	0.26	0.04	0.05	0	0.17	0.62	0.1	0	0	0.53
Apples	0.93	0.11	0.03	0	0.78	0.17	0.03	0.03	0	0.1	0.76	0.08	0	0	0.68

	Explicit environmental claims	Mandatory schemes	EU schemes	National or regional schemes	Other claims	Explicit environmental claims – logos/labels	Mandatory schemes – logos/labels	EU schemes – logos/labels	National or regional schemes – logos/labels	Other claims – logos/labels	Explicit environmental claims - text	Mandatory schemes - text	EU schemes - text	National or regional schemes - text	Other claims - text
Bananas	0.85	0.13	0.06	0	0.67	0.35	0	0.06	0	0.29	0.5	0.13	0	0	0.37
Oranges	0.73	0.15	0.06	0	0.52	0.27	0.07	0.06	0	0.14	0.46	0.08	0	0	0.37
Meat	0.7	0.14	0.05	0	0.51	0.32	0.1	0.05	0	0.17	0.38	0.03	0	0	0.34
Poultry meat	0.48	0.13	0	0	0.34	0.18	0.1	0	0	0.08	0.29	0.03	0	0	0.26
Beef	1.18	0.48	0.09	0	0.6	0.81	0.43	0.09	0	0.29	0.37	0.06	0	0	0.31
Pre-prepared meals	0.6	0	0.03	0	0.57	0.17	0	0.03	0	0.14	0.43	0	0	0	0.43
Lasagne	0.69	0	0.08	0	0.61	0.41	0	0.08	0	0.33	0.28	0	0	0	0.28
Soup (in Tetrapak)	1.1	0	0	0	1.1	0.1	0	0	0	0.1	1	0	0	0	1
Pizza	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Sugar	0.86	0.13	0.03	0	0.7	0.36	0.06	0.03	0	0.27	0.5	0.06	0	0	0.43
Cane sugar	1.19	0	0.13	0	1.06	0.56	0	0.13	0	0.44	0.63	0	0	0	0.63
Granulated white sugar	1	0.5	0	0	0.5	0.44	0.25	0	0	0.19	0.56	0.25	0	0	0.31
Sugar	0.63	0	0	0	0.63	0.23	0	0	0	0.23	0.4	0	0	0	0.4
Vegetables	0.51	0.09	0.03	0	0.38	0.19	0.07	0.03	0	0.08	0.32	0.02	0	0	0.3
Tomatoes	0.77	0.2	0.03	0	0.54	0.33	0.13	0.03	0	0.17	0.44	0.07	0	0	0.37
Canned beans	0.59	0	0.06	0	0.53	0.16	0	0.06	0	0.09	0.43	0	0	0	0.43
Potatoes	0.33	0.17	0	0	0.17	0.18	0.17	0	0	0.01	0.15	0	0	0	0.15

Annex VI: In-depth analysis template

The following template was used by national experts to reflect the in-depth analysis of each claim. The template included an introduction to the study and some general guidance, a table with preliminary information for the identification and categorisation of the claim, the tables for the analysis of the three criteria (clear and unambiguous, accurate and substantiated) with detailed guidance per criterion and a final conclusion, including an assessment on how easy was for the expert to find the information.

[Title of the claim]
Please use a short description of the claim as the Title. For example:
- *If it is a text: 'The first ecological footwear for kids! Growing up with nature!'*
- *If it is a logo you can briefly describe it or use the words contained on it, if any: 'Nordic Ecolabel ('The Nordic Swan')'*

Preliminary information	
Product ID number	*Please use the number from column C 'New ID Ipsos'*
Member State	
Product/Advertisement	
Product category	*Please, select the category among the list provided below.*
Link to product on online store (Products only)	
Type of advertisement (e.g. print, radio, etc.) (Advertisements only)	
Claim description	*Please, add a screenshot of the claim if it is a logo/label*
	Text description in English of the environmental claim
Claim category (e.g. climate, water, waste, energy, general, etc.)	
Which life-cycle phase does the claim refer to (e.g. resources, production, use, transport, end-of-life)	
Has the claim been correctly categorised as an environmental	*Confirm whether the claim could correctly be identified as a claim that suggests or otherwise creates the impression that a good or service has a positive or no impact on the environment or is less damaging to the*

Preliminary information	
claim?	*environment than competing goods.* *If this is not the case, please notify Sarah and Ivan before proceeding further.*
Does the environmental claim concern a nationally recognised labelling scheme?	*The in-depth analysis is not intended to focus on environmental labels that are recognised in national/regional legislation. If the environmental claim relates to one of the following schemes, please discuss with Sarah and Ivan before proceeding further:* - *CZ: Ekologicky Sertny Vryobek* - *DK, SE, FI: Nordic Ecoloabel* - *DE: Blue Angel* - *HU: Hungarian Ecolabel* - *PO: Polish Ecolabel* - *NL: Milieukeur* - *ES (Catalonia): Catalan Environmental Quality Guarantee Award* - *SE: TCO certification*

Analysis

1 Clear and unambiguous

Clear and unambiguous
To what extent is the claim clear and unambiguous in disclosing the product's environmental benefits and impacts?
General statements of environmental benefits *Assess whether the claim is clearly disclosing the environmental benefits that it offers. Environmental claims **cannot be considered clear** if they are based on vague and general statements and thus difficult to substantiate, such as: 'environmentally friendly', 'green', 'nature's friend', 'ecological', 'sustainable', 'climate friendly', 'environmentally correct' or 'gentle on the environment'. Furthermore, a clear claim should also mention:* o *Whether the claim covers the whole product or only one of its components (and which component);* o *Whether it refers to a company or only to (a) certain product(s);* o *Which stage or stages of the product lifecycle the claim covers or whether it covers all of them;* o *Which of the product characteristics (i.e. the specific environmental benefit) the claim covers.* *However, some products may be subject to detailed and ambitious rules and achieve such an excellent environmental performance that the use of a general benefit claim (presented without further qualifications) may be justified. This could be the case if a product is covered by a license to use the ecolabel of a publicly run ecolabel scheme (such as the Nordic Ecolabel 'Swan', the German 'Blue Angel' or the European Union Ecolabel 'Flower') or other robust and reputable labelling schemes subject to third-party verification. This could also be the case if the life cycle assessment studies of the product have proven its excellent environmental performance (see section below on substantiation). These studies should be made according to recognised or generally accepted methods applicable to the relevant product type and should be third-party verified. If such methods*

| **Clear and unambiguous** |
| To what extent is the claim clear and unambiguous in disclosing the product's environmental benefits and impacts? |

have not yet been developed in the relevant field, traders should refrain from using general benefit claims.

For such products, traders should nevertheless ensure transparency concerning the relevant environmental aspects, and make sure that such information is easily available to consumers, including by displaying the relevant logo.' If a trader or industry chooses to use own labelling schemes, symbols or certificates for marketing purposes, the meaning or significance of the label must also be made clear to the consumer.

Misleading omissions
A misleading omission can occur when an environmental claim omits material information about the negative environmental impacts of a product, or they provide such information in an unclear, unintelligible, or ambiguous manner. For example, a company may have reduced the negative effects of a product on the environment during one of the phases of the product life-cycle, but the main negative impacts of the product occur in other phases of the life-cycle and, therefore, a general claim stating that the product is environmentally friendly would be misleading. E.g. A manufacturer claims that its product is low in water use. However, at the same time the product consumes more energy than a comparable product of the same category, which increases the product's overall environmental impact significantly. This claim could be considered a misleading omission, as the trader has not disclosed the information most that is most relevant to whether it is a green claim.

Multiple meanings
If a claim has multiple meanings and it is not clear which meaning if refers to, it may be considered an ambiguous claim.

Comparisons
If a claim makes a comparison without specifying the reference of the comparison, it may be considered an ambiguous claim. For example: in the claim '50% less carbon emissions', it is not clear what the comparison refers to: e.g. the product may be compared to a competing product, or to a previous version of the same product.

In addition, if a company makes a comparison with other products, these products must be of the same category and the method used to produce the information is the same.

Confusion of labels
If a trader or industry chooses to use own labelling schemes, symbols or certificates for marketing purposes, such labels must not be capable of being confused with other labels, including, for example, labels of publicly run labelling schemes or schemes of competitors.

2   Accurate

Accurate
To what extent is the claim accurate? Is the claim factual and truthful?
Assess whether a claim is accurate. To assess this, consider whether there is anything in the claim that would suggest the claim is false or not truthful. If a claim contains such information, it cannot be considered accurate. This will include: o *Claims that are likely to be untrue. For example, claims that a product or its packaging are '100% recyclable', but cannot be recycled in most areas.*   o *Claims that include information that appears to be intended to mislead consumers. For example, a claim that a product has the 'highest energy savings', but it bears an 'A' class energy label, while products that have A+, A++ labels are more energy efficient.*   *If a trader or industry chooses to use own labelling schemes, symbols or certificates for marketing purposes, these labels must only be applied to the products/services or traders which meet the criteria set to qualify for use. The criteria should demonstrate clear environmental benefits compared with competing products or traders and should be easily publicly accessible. Otherwise, the labelling is likely to be misleading.*   *For example: A trader has subscribed to a binding code of practice that promotes sustainable use of wood and displays the code's logo on its website. The code of practice contains a commitment that its members will not use hardwood from unsustainably managed forests. However, it is found that the products advertised on the website contain wood from exactly such a forest.*   *Note that you are not expected to independently verify the accuracy of the trader's claims. Instead, you are asked to consider whether, based on your knowledge of environmental law and policy, the claim is likely to be accurate.*

3   Substantiated

Substantiated
To what extent is the claim verifiable through evidence available to the public?
In order to ensure that environmental claims are substantiated, traders should either have the evidence necessary to support their claims from the time the claims are put into use or be certain that it can be obtained and presented upon request. This information should be clear and robust and, where relevant, use the most appropriate methods for measuring and reporting impacts.   *If a trader or industry chooses to use own labelling schemes, symbols or certificates for marketing purposes, traders should consider third party verification to ensure the credibility and relevance of the label.*   *Additionally, although a claim may be correct and relevant to a product when the claim is first made, it could become less meaningful with time. In order to ensure that they are in a position to provide*

Substantiated
To what extent is the claim verifiable through evidence available to the public?

necessary documentation to national authorities in line with Article 12 of the UCPD traders should make sure that documentation for claims is up-to-date for as long as the claims remain in use in marketing.

To assess to what extent the claim is verifiable, you will need to look if there is any information provided that would help to find further information about the claim. This could for example include a link to a website, a QR code, contact details or the specific name of an environmental label or code of conduct.

If a link is provided, please, go to the address and explore the website. If no link is provided, please carry out an internet search to see if you can locate the trader's website or other relevant information. Note down if the website offers information about the substantiation of the claim. If the product label or advertisement includes a reference to a standard for measuring or reporting impacts, or an environmental labelling or certification scheme, please note whether the details of the standard or scheme are clearly provided. Please note whether there is any reference to any third-party verification or certification. Again, <u>you are not expected to independently verify the trader's claims, but to examine whether there is information that appears to verify the trader's claims that is relatively easy to access.</u>

If you are unable to locate any relevant information, you may send an email to the trader requesting information about the environmental claim. If they do not respond in a reasonable period of time (i.e. no more than 10 working days), you are not expected to make any further enquiries. If you need to complete report during this period, please note in the report that the trader has been contacted – you can update us later if needed.

Several examples are provided below to understand the kind of claims that could be misleading regarding their substantiation:

Example 1:
An advertisement stated, 'This is a revolutionary new paint stripper that is safer to its user and the environment'. The trader believed that the extremely low level of VOC content in its product meant that it was safe for the environment. However, the UK Advertising Standards Authority (ASA) considered that the claim needed to be supported by a high level of substantiation. As the ASA had not seen such evidence, they concluded that the claim was misleading.

Example 2:
An advertisement stated 'Bamboo V's [sic] Organic Cotton.100 % ecofriendly. Find out why it's better than cotton and good for you'. A complainant argued that the claims that the products were made from bamboo and '100 % eco-friendly' were misleading and questioned whether they could be substantiated. The UK Advertising Standards Authority (ASA) noted that the trader had provided copies of two scientific articles they believed substantiated the claims. The ASA noted that the articles described the manufacture of bamboo from its raw state to its use in clothing but did not provide sufficient evidence that manufacturing bamboo clothing had little or no impact on the environment or

Substantiated	
To what extent is the claim verifiable through evidence available to the public?	
that the clothing sold by the trader was actually made from bamboo. *Example 3:* *A Spanish court considered misleading an advertising claiming that filtered water was more environmental friendly than mineral bottled water, giving consumers the impression that consuming filtered water instead of mineral water would contribute to the protection of the environment. In particular, the reference to greater protection of the environment was deemed misleading since the comparison was not based on any objective basis such as an impact study*	

Conclusions

Conclusions	
Overall conclusion *Is this a misleading claim according to the above three criteria? Explain your conclusion.*	
Other issues *Notwithstanding the conclusion above, are there any other issues in the claim that lead you to consider it potentially misleading for consumers?*	
Ease of accessing evidence *How easy was it to find evidence to substantiate the claim?*	*Please provide an assessment of how easy it was to access the evidence needed to substantiate the claim. Please state whether you would consider the ease of accessing evidence to be **High**, **Medium**, or **Low**, according to the following categorisation, with a brief explanation of your conclusion:* • ***High**: The product label or advertisement provided information that helped to quickly locate evidence that substantiated the claim. For example, it provided details of a link to further information or the name of a labelling scheme or standard of assessment that could be used to substantiate the claim.* • ***Medium**: While the product label or advertisement did not provide information that helped to quickly locate evidence that substantiated the claim, this information could be found relatively easily. For example, the information could be found by an internet*

	search of the product brand name or on the trader's website. • ***Low****: It was not possible, or extremely difficult, to local information that could substantiate the claim, or the information that could be identified did not substantiate the claim. For example, there was no information on the trader's website that could substantiate the claim.*

Annex VII: Briefing document – Mystery shoppers

Submitted in a separate Word file

Annex VIII: Briefing document – Advertisement analysts

Submitted in a separate Word file