

Approved Definitions

Carbon Dioxide

In general, it is exhaled by animals and inhaled by growing plants. Additional carbon dioxide is created by the combustion of fossil fuels or vegetable matter, among other chemical processes. Carbon dioxide is an important greenhouse gas because of its ability to absorb many infrared wavelengths of the sun's light, and because of the length of time it stays in the Earth's atmosphere. Due to this, and the role it plays in the respiration of plants, it is a major component of the carbon cycle.

Carbon Footprint

Refers to the aggregate amount of Greenhouse Gas Emissions (GGH) that is released as caused by an organization, event, or a product. Typically, this is reported as the amount of Carbon Dioxide that is released, or other Green House Gases. (*Wiedmann, T. and Minx, J. (2008). A Definition of 'Carbon Footprint'. In: C. C. Pertsova, Ecological Economics Research Trends: Chapter 1, pp. 1-11, Nova Science Publishers, Hauppauge NY, USA.*)

- There are several ways to reduce the carbon footprint of our products and packaging.
 - Reducing the weight of a product or size of carton saves fuel cost needed to transport those goods to market; releasing less CO₂ into the atmosphere.
 - Using less plastic in our packaging lowers the amount of petroleum used to manufacture that packaging. Or, use alternative packaging such as paper or bio-plastic to package your product.

Compostable

A characteristic of a product, packaging or associated component that allows it to biodegrade.

- A process where the material will breakdown using aerobic decomposition through mixing; and the introduction of oxygen, nitrogen, carbon, and water. This can be accomplished through home or industrial composting facilities. (*ISO 14021:1999 (E); 7.2.2.1*)
- If making a claim of compostable, the claim should specify whether the type of composting facility or process in which the identified component is compostable is a home-composting facility or an on-site or central composting facility, unless the product is compostable in all types of composting facilities, in which case no qualification is necessary.
- Must be compostable in a “reasonable amount of time”; similar to the amount of time it would take for organic material such as yard clippings or food items to compost on their own. (*FTC Green Guide; www.ftc.gov*)

Degradable / Biodegradable / Photodegradable

A characteristic of a product or packaging that allows it to break down to a specific extent and return to nature within a given time. Typically under 6 months.

- Claims of degradability shall only be made in relation to a specific test method that includes maximum level of degradation and test duration, and shall be relevant to the circumstances in which the product or packaging is likely to be disposed. (ISO 14021:1999 (E); 7.3.1)

Designed for Disassembly

A characteristic of a product's design that enables the product to be taken apart at the end of its useful life in such a way that allows components and parts to be reused, recycled, recovered for energy or, in some other way, diverted from the waste stream.

- A claim of designed for disassembly shall be accompanied by an explanatory statement that specifies the components or parts to be reused, recycled, recovered for energy or, in some other way, diverted from the waste stream. (ISO 14021:1999 (E); 7.4.1)

“Environmentally Safe”, “Environmentally Friendly”, “Environmentally Preferable”, “Green”, “Eco-Friendly”

- These are all examples of non-specific or vague claims and these terms should not be used because they are misleading.
- Suggests environmental benefits without qualification or verification.
- EVERY product or service exerts some adverse impact on the environment throughout their lifecycle. (ISO 14021:1999 (E); 5.3- *Vague or non-specific claims*)

Environmental impact

Any change to the environment, whether adverse or beneficial, wholly or partially resulting from an organization's activities or products. (ISO 14021:1999 (E); 3.1.5)

Extended life product

A product designed to provide prolonged use, based on either improved durability or an upgradability feature that result in reduced resource use or reduced waste.

- Extended life claims that are based on the improved durability of the product shall state the extended life period or the percentage improvement and the measured value (e.g. repetitive number of operations before breakage) or reasoning that supports the claim. (ISO 14021:1999 (E); 7.5.1)

Green Washing

The misleading of consumers, either intentionally or unintentionally, as to the environmental benefits or practices of a company, product, or service. To avoid green washing, be sure to:

- Make accurate and verifiable statements
- Be specific in Green claims
- If needed, make qualifying statements to distinguish which part your claim relates to.
- Avoid making vague or non-specific claims
- Claim should be relevant to the product or context
(www.sinsofgreenwashing.org)

Green Guides for Environmental Marketing Claims

Guidelines set forth and enforceable by the US Federal Trade Commission (FTC) to help marketers make environmental claims that are not misleading or false to consumers.

(www.ftc.gov)

Mobius Loop

The Mobius loop is a symbol in the shape of three twisted chasing arrows forming a triangle. This can apply to either product or packaging. (ISO 14021:1999 (E); 5.10.2.1)

- If there is the potential for confusion between product and the packaging, must add a qualifier stating which we are referring to (product, package, or service).
- If calling out recycled content, the Mobius loop must be accompanied by the % of Pre or Post consumer recycled content.

Packaging

Refers to material that is used to protect or contain a product during transportation, storage, marketing or use. This also includes any item that is physically attached to, or included with, a product or its container for the purpose of marketing the product or communicating information about the product. (ISO 14021:1999 (E); 3.1.10)

Qualified environmental claim

An environmental claim which is accompanied by an explanatory statement that describes the limits of the claim. (ISO 14021:1999 (E); 3.1.12)

Recyclable

A characteristic of a product, packaging or associated component that can be diverted from the waste stream that can be collected, processed and returned to use in the form of raw materials or products. (ISO 14021:1999 (E); 7.7.1)

- Must be recyclable in majority of municipal curbside recycling programs.
- Must be easily separated to be recycled if made of mixed materials.

Recycled content

The proportion, by mass, of recycled material in a product or packaging. Only pre-consumer and post-consumer materials shall be considered as recycled content, consistent with the following usage of terms. (ISO 14021:1999 (E); 7.8.1.1). There are (2) Types:

1. Pre-Consumer
 - Material diverted from the waste stream during a manufacturing process. Excluded is reutilization of materials such as rework, regrind or scrap generated in a process and capable of being reclaimed within the same process that generated it.
2. Post-Consumer
 - Material generated by households or by commercial, industrial and institutional facilities in their role as end-users of the product which can no longer be used for its intended purpose. This includes returns of material from the distribution chain.

Recycled material

Refers to material that has been reprocessed from recovered (reclaimed) material by means of a manufacturing process and made into a final product or into a component for incorporation into a product. (ISO 14021:1999 (E); 7.8.1.1)

Repurposing

Reusing something that has outlived its original purpose or usefulness and creating something different.

Recovered (reclaimed) material

Material that would have otherwise been disposed of as waste or used for energy recovery, but has instead been collected and recovered as a material input, in lieu of new primary material, for a recycling or a manufacturing process. (ISO 14021:1999 (E); 7.8.1.1)

Renewable Energy

The most common definition is that renewable energy is from an energy resource that is replaced by a natural process at a rate that is equal to or faster than the rate at which that resource is being consumed. (ISO 14021:1999 (E); 7.9.1)

Reduced Energy Consumption

Reduction in the amount of energy associated with the use of a product performing the function for which it was conceived when compared with the energy used by other products performing an equivalent function. (ISO 14021:1999 (E); 7.9.2)

Reusable and Refillable

1. Reusable - A characteristic of a product or packaging that has been conceived and designed to accomplish within its life cycle a certain number of trips, rotations or uses for the same purpose for which it was conceived. (ISO 14021:1999 (E); 7.12.1.1)
2. Refillable - A characteristic of a product or packaging that can be filled with the same or similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing. (ISO 14021:1999 (E); 7.12.1.2)

Self-declared environmental claim

An environmental claim that is made, without independent third-party certification, by manufacturers, importers, distributors, retailers or anyone else likely to benefit from such a claim. (ISO 14021:1999 (E); 3.1.13)

Source Reduction

Lowering the amount of weight, volume, or toxicity of a product or package. To use this claim, you must be able to qualify the reduction and give the basis for any such comparison.

Sustainability Score Card

Wal-Mart's new rating system for their supplier's products & packaging.

Waste Reduction - Reduction in the quantity (mass) of material entering the waste stream as a result of a change in the product, process or packaging. (*ISO 14021:1999 (E)*; 7.13.1)

ISO 14000

Environmental management standards that exist to help organizations minimize how their operations negatively affect the environment (cause adverse changes to air, water, or land), comply with applicable laws, regulations, and other environmentally oriented requirements, and continually improve on the above.

Guidelines for Environmental Marketing Claims

When marketing an environmental benefit of a product, package, or service of Fellowes, we will adhere to the “FTC Green Guides for Marketing Claims” and reference the concepts and definitions of ISO 14021 “Environmental labels and declarations”.

FTC Green Guides for Marketing Claims

- Provides guidelines for what kind of marketing claims we can make on our products or packaging.
- Guides are written from the consumer’s perspective and its goal is to help marketers avoid making misleading or false claims.
- Enforced by Federal Trade Commission (FTC)
- Express or implied claims must have *substantiation* and *specificity*.
 - a. *Substantiation* is a reasonable basis for claim, but must be supported by test, research, analysis, or studies if requested.
 - b. *Specificity* is important when there is a potential for confusion on the part of the consumer. A marketer must specify if claim refers to product, package, or service.
- Claims should be as specific as possible and marketer should avoid general claims
 - a. “Earth-Friendly” is acceptable **IF** it were followed by text stating what part of the product or package is beneficial. For instance, “The microfiber cleaning cloth is reusable and is made from 100% recycled fibers” would be an acceptable qualifying claim.
- Offers guidelines on use of environmental symbols or pictures
 - a. Using a symbol on a product or package is essentially making a claim and as such, must have substantiation and specificity.
 - b. Location of the symbol on product or package can affect the need for substantiation. Marketers should consult this guide for this.

Guidelines to follow for some common types of environmental claims:

1. **Comparative environmental claims**- a claim that compares one version to another. (*FTC Green Guide*; www.ftc.gov)
 - a. Should clearly indicate what is being referenced and it must be verifiable and quantifiable.
 - i. Incorrect claim would be “50% more recycled content” because there is not a reference to what is being compared.
 - ii. Instead, “50% more recycled content than our previous model” is an appropriate claim.

2. General Environmental Claims

- a. Claim that gives the impression of a characteristic benefit to the environment over another product. (*FTC Green Guide*; www.ftc.gov)
- b. Important to remember is that the company making this claim should be able to provide substantiation to this claim.
 - i. Examples include “Eco-Friendly”, “Environmentally friendly”, “Environmentally Safe”, etc.
 - ii. These claims are not deceptive if the attributes or environmental benefit of that product were clearly communicated or understood by the consumer.
 - iii. For instance, “Earth Series” partition additions may be a deceptive claim **IF** we did not add the qualification that the “product is made from 98% pre-consumer recycled MDF material”. Since this is printed directly below the claim on the package, this claim is substantiated and therefore not deceptive.

3. ECO-Seals, Seals of Approval, and Certifications

- a. Conveys to end user that product is environmentally better than other similar products.
- b. These are third party certification claims and the important thing to note is these must all have substantiation and be verifiable. (*FTC Green Guide*; www.ftc.gov)
- c. Most certifications come with their own set of Brand ID guidelines that must be followed to maintain certification.
- d. Example is banker’s box and Sustainable Forestry Initiative (SFI) Certification.

4. Degradable or Bio-degradable Claims

- a. To make this claim, you must reference, and be able to provide documentation, on the specific test used to certify biodegradability. (*FTC Green Guide*; www.ftc.gov)
 - i. For instance, while a typical cleaning cloth is made from crepe paper, a claim of biodegradability would not be appropriate unless the specific test procedure and standard used to verify that biodegradability was available and referenced on the packaging. Even if it were 100% plant fiber, the claim is not appropriate unless substantiation exists.
- b. Must also indicate the location and circumstances where the degradation will occur; whether indoor or outdoor landfill.

5. Recyclable Claims

- a. Claim applies to products that can be collected, separated or recovered from the solid waste stream and used again, or

reused in the manufacture or assembly of another package or product through an established recycling program. (*FTC Green Guide*; www.ftc.gov)

- b. To claim recyclability, the material must be able to be collected within a **substantial majority** of curbside municipal collection programs where the product is being used.
- c. When making a claim of recyclability, you should make clear to consumers whether it refers to the product, the package, or both.
 - i. For instance, “Package is 100% recyclable” is appropriate for Fellowes Earth Series Mouse Pads. While the product is made from 95% recycled tire rubber, the rubber itself is not considered easily recyclable. The claim correctly differentiates the package from the product in terms of recyclability.
- d. Recycled content does not guarantee recyclability

6. Recycled Content Claims

- a. If the product or package does not consist of 100 percent recycled content (excluding minor, incidental components), the claim must use qualifying words to limit the claim. (*FTC Green Guide*; www.ftc.gov)
- b. Claim should also indicate % of recycled content and what part of product or package it refers to.
- c. Calculated by total weight of product
- d. Should indicate whether recycled content is pre-consumer or post-consumer recovered materials.
- e. Substantiation is necessary to make a claim of recycled content.

7. Reduced Energy Consumption

- a. Reduction in the amount of energy associated with the use of a product performing the function for which it was designed when compared to energy used by different products designed to perform the same function.
- b. Does not include energy used to manufacture product; only use of product. (*ISO 14021:1999 (E)*; 7.9.2)
- c. This is a comparative claim and must be substantiated.

8. Reduced Resource Use

- a. Claim that highlights the reduction of material, energy, or water used to produce a component, product, or package.
- b. This is a comparative claim and must be substantiated.
- c. Should be qualified as a percentage reduction and must separate product and package. (*ISO 14021:1999 (E)*; 7.10.2.4)

- d. If reduction causes an increase of another resource, that increase must be stated. (*ISO 14021:1999 (E)*; 7.10.2.6)

9. Use of Symbols

- a. Symbols on product or packaging can constitute an environmental claim **IF** placed in a prominent location.
 - i. Most claims need substantiation, so one should be aware of symbol placement and potential claim they are making. (*FTC Green Guide*; www.ftc.gov)
- b. Most common symbol used is the Mobius Loop (also called Three chasing arrows), and is internationally recognized.
 - i. Main issue is consumers are often confused and assume it can mean the product and package are both recyclable and made from recycled materials.
 - ii. Marketer should qualify this by adding text with the symbol indicating the % of recycled material; either pre or post consumer). (*FTC Green Guide*; www.ftc.gov)

ISO 14021

ISO 14021 is an internationally recognized standard for Environmental labels and declarations. While we have referenced many of the definitions and guidelines outlined in ISO 14021, we are using these standards as a guideline only. As marketing environmental attributes of products becomes more prevalent, we want to ensure that we are doing all we can to appropriately label our products and packaging. ISO 14021 is appropriate to incorporate into our marketing strategy as it relates to the environmental attributes of our products or packaging.

- *Type I – Eco-labeling Programs*
 - a. Sometimes called “Eco-Labeling”, this is typically created by companies voluntary to highlight or promote certain products as environmentally preferable to other products within the same product category.
 - b. A good example of this would be Staples and their “Eco-Office” line of products. (*ISO Best Practices*)
 - c. There is a Type I EL program and the main difference is the Type I EL is independently verified by third party.
- *Type II - Self-declared environmental claims*
 - a. Relies heavily on use of statements, symbols and graphics, to communicate the environmental impact of the product or material.
 - b. Does not require verification by third party.
 - c. Must be accurate, verifiable, and not misleading.
- *Type III - Environmental Product Declaration*

- a. Environmental labeling / declaration that is based on third party review and independent verification, quantified environmental life cycle product information analysis, provided by a supplier. (*ISO/TR 14025:2000(E)*)
- b. There is a Type I EL program and the main difference is the Type I EL is independently verified by third party.

Seven Sins of Green Washing

1. Sin of the Hidden Trade-off

Suggesting a product is 'green' based on an unreasonably narrow set of attributes without attention to other important environmental issues.

- Paper, for example, is not necessarily environmentally-preferable just because it comes from a sustainably-harvested forest. Other important environmental issues in the paper-making process, including energy, greenhouse gas emissions, and water and air pollution, may be equally or more significant.

2. Sin of No Proof

When an environmental claim that cannot be substantiated by easily accessible supporting information or by a reliable third-party certification.

- Common examples are facial or toilet tissue products that claim various percentages of post-consumer recycled content without providing any evidence.

3. Sin of Vagueness

When claims are poorly defined or broad that its real meaning is likely to be misunderstood by the consumer.

- "All-natural is an example. Arsenic, uranium, mercury, and formaldehyde are all naturally occurring, and poisonous. "All natural" isn't necessarily "green".

4. Sin of Irrelevance

When an environmental claim is made that might be truthful, but has little relevance to the product or service being sold.

- "CFC-free" is a common example, since it is a frequent claim despite the fact that CFCs are banned by law.

5. Sin of Lesser of Two Evils

Marketing in such a way that may be true within the product category, but actually distracts the consumer from the greater environmental impacts of the category as a whole.

- Organic cigarettes are an example of this category, as are fuel-efficient sport-utility vehicles.

6. Sin of Fibbing

Making intentionally false environmental marketing claims.

- The most common examples were products falsely claiming to be Energy Star certified or registered.

7. Sin of Worshiping False Labels

Exploiting consumers' demand for third-party certification by creating fake labels or false suggestions of third-party endorsement.

(www.sevensinsofgreenwashing.org)