

**Misleading environmental claims:
stakeholder survey**

Closing date: 14 December 2020

The Competition and Markets Authority (CMA) will be investigating if 'eco-friendly' claims could be misleading consumers, and want to hear from interested parties about any information or research that could:

- inform the focus of its project
- help to shape the business guidance and any other outputs for the project
- support any recommendations to government

About you

1. How would you describe yourself?

- Academic
- Consumer organisation
- Third sector organisation
- Government department
- Regulatory or enforcement body
- Other

2. Please provide your contact details

(if you are happy to be contacted to discuss your response in more detail)

(provided)

Project focus

3. Which issues do you think the CMA should be focusing on, and why?

- Claims regarding the sustainability of forest management and forest products, including wood, paper, charcoal, bamboo, rubber, cork and cellulose. Although the rate of forest loss has declined substantially, an estimated 420 million ha of forest has been lost since 1990 (FAO). The WWF UK Timber Scorecard assesses businesses on their timber product sourcing policies and performance. Of their 2019 report they say, “Our findings suggest that, overall, the private sector’s willingness to take further steps to develop their standards of operating is waning; and the businesses that plan to do their part are already doing so, while the gap between leaders and laggards is widening.” Businesses must not be permitted to ‘greenwash’ their way apparent sustainability.

- Support credible certification by: ensuring any new initiatives do not jeopardise well-established environmental labelling schemes; fighting unreliable labels and claims; protecting robust labels, logos, and claims respecting strong sustainability requirements, such as the ones developed by ISEAL, the global association for sustainability standards (<https://www.isealalliance.org/>).
- Who is checking compliance? Independent oversight and third-party auditing can help to monitor/ensure implementation and increase consumer trust in claims.

4. Are there any particular sectors or behaviours (business or consumer) you think we should focus our attention on?

Please give reasons for your suggestions

- Forest products (see above)
- On-product environmental claims and labels. Our 2015 survey (2,080 UK adults (18+); fieldwork: 30th- 31st March 2015; conducted online by YouGov Plc.on behalf of FSC UK) revealed that 52% of respondents were likely to look for FSC product certifications or endorsements on product packaging.
- Off-product environmental claims e.g. in advertising. Our 2015 survey revealed that 49% of respondents were likely to look for FSC product certifications or endorsements on displays in the shops where the products are sold and 44% in a catalogue featuring the products. 37% were likely to look on the website of the retailer and 35% on the website of the manufacturer.

Your activity

5. Is your organisation currently involved in or leading any projects which look into or seek to understand behaviour or attitudes towards environmental claims?

The Forest Stewardship Council (FSC) was established to promote responsible management of the world's forests. Its pioneering certification system, which now covers more than 220 million hectares, is one way in which people are working to take care of forests. Whilst FSC sets the standards with which certificate holders must comply, the task of auditing against these standards is performed by independent, accredited, third-party auditors. Regular research is undertaken by both FSC International and FSC UK to establish awareness of FSC and attitudes/behaviours regarding the purchase of forest products and environmental (and social) claims in relation to those products.

6. Has your organisation done any of the following?
(please select all that apply)

- Undertaken any surveys/questionnaires to gather the views of consumers or businesses on environmental claims

- Produced any advice or guidance to support businesses in making environmental claims
- Produced any advice or guidance to support consumers to understand and/or interpret environmental claims

7. Would you be willing to share any of the above with us?

- Yes
- No

Other activity

8. Are there ongoing or planned initiatives, policies, campaigns or enforcement activities that we should be aware of and should take account of when scoping the focus of our project?

The Forest Stewardship Council scheme enables businesses and consumers to identify, purchase and use wood, paper and other forest products made with materials from well-managed forests and/or recycled sources. FSC has standards for forest management and chain of custody and issues promotional trademark licences. FSC owns a portfolio of trademarks worldwide. Protecting these trademarks maintains the integrity of the FSC system and ensures that those who have invested time and resources in responsible forest management and production are properly identified and rewarded. FSC UK has a dedicated Trademark Enforcement Officer (part-time).

9. Are there any examples of good practice that you would want to highlight? (e.g. government / regulatory interventions or private sector initiatives that have improved information provision to consumers)

Please include details of all issues you think may be relevant, regardless of size, geographical focus, etc.

The Forest Stewardship Council promotes environmentally appropriate, socially beneficial, and economically viable management of the world's forests (see <https://www.fsc-uk.org/en-uk>). It is a member of ISEAL Alliance, the global association for sustainability standards. ISEAL's credibility principles are available at [ISEAL Credibility Principles \(isealalliance.org\)](https://www.isealalliance.org).

Research

10. Has your organisation conducted, or are you aware of, any relevant research that you would be able to share with us?

We would be particularly interested in any research into:

- *the prevalence of environmental claims and/or the products where consumers care most about the environmental performance of a product or service*
- *consumer behaviour when confronted with marketing or advertising that includes environmental claims about a product or service, or the performance of the business*

Yes, see <https://www.fsc-uk.org/en-uk/newsroom/id/665>.

Other information

11. Please let us know about any other issues you think might be relevant for our project:

FSC UK would be very interested in collaborating in and/or further informing a project of this nature.