

# Communicating Sustainability

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An initiative by

**BORD BIA**  
IRISH FOOD BOARD



**HAVAS GENUS**  
Sustainability Consultants





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# Introduction

**Sharon Colgan**

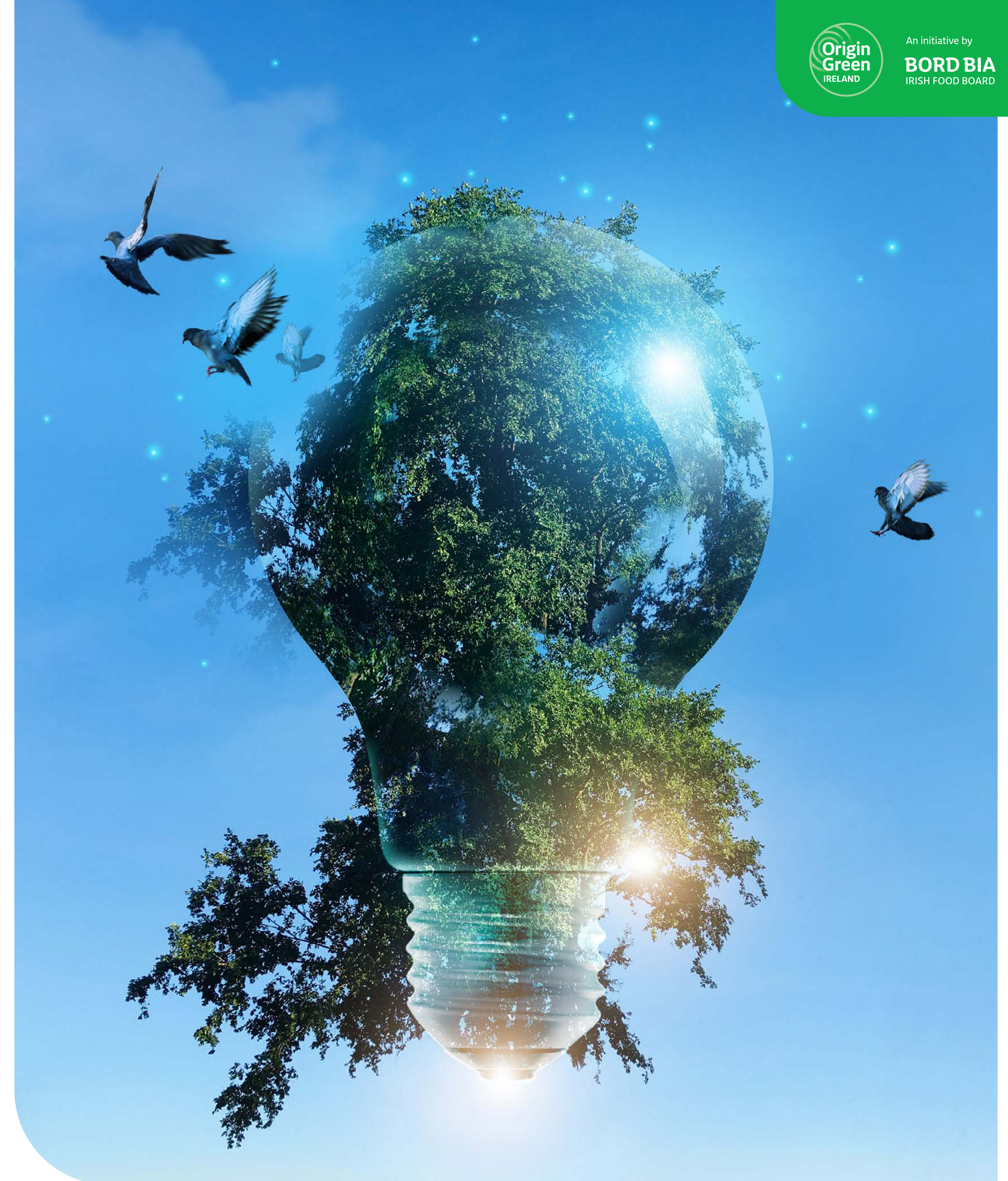
Programme Marketing Manager, Origin Green

The agenda around food sustainability has accelerated over the past five years, and recent research from Bord Bia's Thinking House has shown that this acceleration is set to continue despite the cost of living pressures and global unrest. Businesses need to take action, which is what you, as Origin Green member companies, are doing. Your company is taking multiple steps across many environmental and social sustainability issues, and these are all third-party verified in terms of progress on their actions.

At Bord Bia, we want to empower those responsible for marketing communications in Origin Green members' companies to communicate your company's actions confidently. We aim to arm you with the right sustainability messages for the audiences you are engaging with, keeping you mindful of the pitfalls such as greenwashing.

We partnered with Chris Upton and his team in Havas Genus to develop content for a three-hour webinar that gave a comprehensive overview of the sustainability communications landscape, addressing the issues our members told us they needed help with including; new legislation, creating the right message, and reaching the right audience. The webinar, Communicating Sustainability, was held at the end of 2022 in partnership with Havas Genus and was attended by marketing and communications professionals across our Irish food, drink and horticulture membership base.

This handbook includes the key topics discussed in the webinar and signposts you along the way to the webinar content that you can view for further information.





# 1 Thoughts from Sustainable Change-Maker, Mike Barry

The excerpts below are taken from Mike Barry's talk during the Bord Bia Communicating Sustainability Webinar.

## THE DEMAND FOR HONEST INFORMATION

We have all grown up in a world where environmental and social issues have formed a part of our brand and business strategies. But it has largely to date been about compliance with the law or retailer requirement, or a nod to consumer sentiment.

This is changing. Your customers, consumers and employees will want to know more about how you behave as corporate entities, as individual farmers in your community and in terms of the products you put on the marketplace. They look at big business and government to take a lead and make it easy for them. They want the food system to make it easier for them to change. Now, some will understandably point out the additional costs involved. Which has led to the idea of a Green Premium. To those who are hoping to build this into their strategy, it would be worth reconsidering. There is no green premium. To the marketplace it is simply saying "I have not polluted your planet, now give me more money". This is not a long-term strategy. People are rightly turning around and telling businesses that if they pollute, they need to fix it. What there is a premium for are products that people feel are aspirational, that taste better, that have better transparency and a great story.

We've got to learn to use sustainability to underpin those emotional stories in products as well. So as much as consumers are feeling great challenge at this moment in time in terms of the cost of living crisis, they want us to step forward and change the system around them. They want to be given the information they need to make better choices, to be given the positive and transparent reasons to buy a greener product.

**"Your customers, consumers and employees will want to know more about how you behave as corporate entities, as individual farmers in your community and in terms of the products you put on the marketplace".**





**From 2023, France will mandate front-of-pack carbon labelling for food and fashion.**

## ENABLING AND EMPOWERING CHANGE

Eco-labelling trials, or carbon labelling trials, are gaining traction, with dozens taking place across Europe. From 2023, France will mandate front-of-pack carbon labelling for food and fashion. It is expected that Brussels will likely replicate the scheme across all 27 member states if it proves successful, with the UK following suit. There are also dozens of different independent social and environmental labels.

Walmart has brought in “Built for Better”, while Amazon has brought in “Climate Pledge Friendly”. What is critical is *simplifying the decision process* for consumers.

Hospitality companies are also starting to embrace carbon labelling with CO2e figures appearing on menus beside calorie counts. Whether it is meal kit companies like Mindful Chef or Hello Fresh, hospitality companies in the US, like just Sal Pan Bread, people are starting to be given information about the totality of the carbon impact for many ingredients that are put into a product.

This, in turn, creates demands for suppliers and farmers who can demonstrate their sustainability credentials. It is about making it easy.

Retailers are becoming the gatekeepers to the marketplace instead of the customer self-selecting. Suppliers must demonstrate and prove their credentials before they can even get through the door.

We believe it is inevitable that more and more retailers will follow this approach to simplify the choice for their consumers and also help their businesses achieve its carbon targets.



## What three enablers will set you up to succeed in this world where you will need to cut carbon by 90% while increasing communication with retail partners and consumers?

**Scope 3 Emissions:** This changes how we measure sustainability, from the immediate product impact to the business's total lifecycle and supply chain. For example, less than 10% of a large retailer's carbon footprint is the shops, trucks and warehouses, and offices they own. Circa 90% of its footprint is the supply chain that makes the products they sell and the consumer that use them. The retailers that win in the future are the ones that are looking at Scope 3 today so that they can create an ecosystem of collaboration and partnership, from the farmer to the producer, the retail space through to the consumer. They are building the support structures for their farmers and manufacturing base along this journey, not expecting them to achieve success alone.

**Digital and Data:** Place this at the very heart of what you do. Look at how you can measure individual footprints, assess impacts, understand the value chain and present all this data in a usable way to share with the government, retailers, investors, and even consumers. To achieve this, sustainability needs to be fully integrated into every aspect of your business. The days of assigning someone to sort the "green stuff" have passed. Sustainability should be a cornerstone of your business plan, and it should challenge you to ask how it will improve efficiency. How will it help reduce waste, generate less plastic, use fewer miles, and burn less fuel? How will it motivate your workforce and grow your reputation? Sustainability will be how your brand will remain relevant in a rapidly changing marketplace.

**Collaboration:** We must recognise that we will need help to solve this. We are looking at 90% decarbonisation of our business models within 17 years. And 80% of what we need to do must be done together. We will have to collaborate, and we will have to engage and involve our consumers and customers.

The food system that we all participate in has started an inevitable transformation. It is a change that will be deep, vertical and rapid, driven by innovations like cellular meat, hyper transparency, personalisation of diet, regenerative agriculture, and every nook and cranny of the food system. As Origin Green members, you have already taken an essential first step towards this exciting transformation and are perfectly positioned to realise the fantastic opportunities that will emerge.





# 2 Havas Genus Transformation Compass

The sustainability transformation compass describes what constitutes ambition in sustainability today. Sustainability has gone through an evolution from avoiding damaging behaviours to a mindset of regenerating broken systems. Each level of the compass requires a mindset shift in the whole organisation and it is important to consider how ambition, action and communication all align to ensure honest and authentic communication.



## Risk Mitigation

At this level organisations are concerned primarily with compliance. These are the laggards in sustainability - keeping up with legal obligations and very little more. Sadly, this is where most businesses in the world are today, and it is not enough to meet the IPCC climate targets.



## Zero Harm

Often referred to as Sustainability 2.0. At this level businesses recognize the harm that is being done to the planet and its people. There is an acknowledgement that we have a responsibility not just to adhere to the lowest common denominator of the law but also, to ensure that we are not damaging the world we live in more than we already have. For many businesses this is a highly ambitious step and is in line with the IPCC recommendations that would limit global warming to 1.5 degrees. An organisation at this level would have set net zero goals in line with the science, ideally be signed up to the science-based target initiative (SBTi), and either have or be in the process of producing climate transition plans. If every business in the world did this, we would be on track to limit the effects of climate change.



## Do Good

This level is where the true leaders in sustainability are operating today. The mindset and ambition go beyond that of not doing harm, but to also repair and replenish past damage. Many organisations will claim to be at this level when instead they are operating at the Zero Harm level which is why despite doing some very positive things, businesses can still be at risk of greenwashing. The core mindset of this group is that even if we were to fully embrace the IPCC recommendations and reduce emissions to near zero over the next 30 years, the world would still be in a worse state than it is today. These organisations are seeking to redress that by actions such as removing historic emissions and repairing damaged ecosystems.



## Just and Regenerative

At this level, a handful of pioneers are seeking to not just repair the damage that has been done, but to change the underlying ecosystems so that they become self-repairing in the future. Businesses with this mindset are not collaborating just within their value chain, but in the entire systems, industries and communities in which they operate to protect planetary boundaries and uplift human welfare.





# Greenwashing Archetypes

When considering the compass, a business should consider not only the ambition of where they would like to be but also look critically at their actions and determine whether these are congruent with the ambition - and only then consider what to communicate and how to say it. To assist with this, we have created the greenwashing archetypes to help you test for congruence.

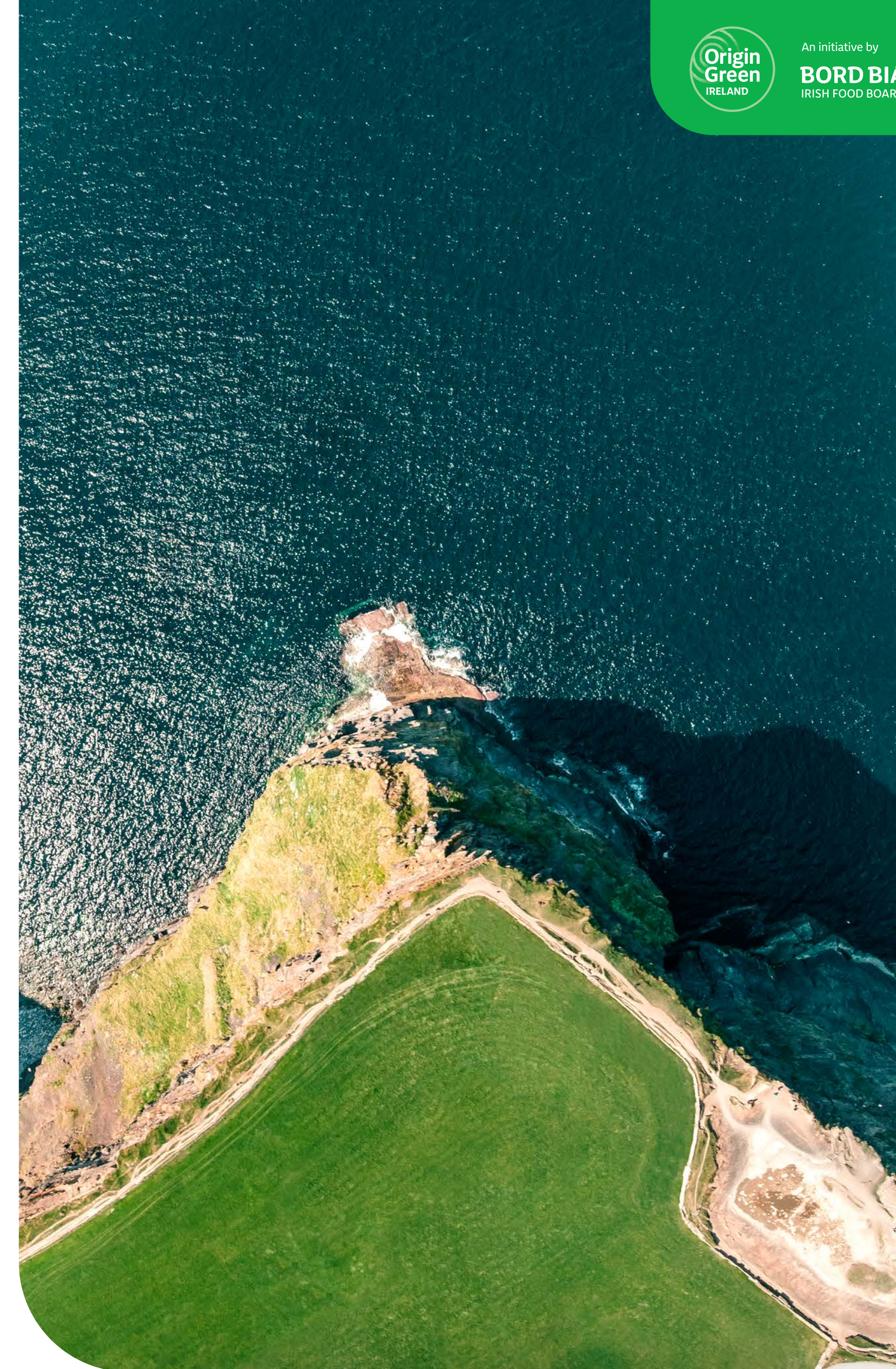




## Greenwashing Archetype:

### AUTHENTICITY

Authenticity is when ambition, action and communication are all aligned. This is the perfect congruence and exists when a business sets bold ambitions and delivers on them, communicating both the action and the ambition without overpromising.





## Greenwashing Archetype: EMPTY PROMISES

In contrast to authentic communication, empty promises are the result when action lags the ambition, but organisations communicate the ambition not the action. A typical example would be having a net zero goal (especially if this is ambitious in itself) and communicating the ambition despite not having a credible transition plan for achieving this. This is often not deliberate, in most of the archetypes the incongruity arises because the ambition, action and communication are owned by different parts of the business. The onus on communicators is therefore to do their fact-checking within their own organisation.





## Greenwashing Archetype:

### BLATANT GREENWASHING

Blatant greenwashing is an extreme version of empty promises. In this scenario the communication is well ahead of both the ambition and the action. And whilst this may not be deliberate it is certainly dishonest, and most definitely greenwashing.





## Greenwashing Archetype:

### GREENHUSHING

The backlash against greenwashing will cause some organisations to remain silent on their sustainability initiatives if the action lags the ambition - a practice known as greenhushing. The tragedy of this approach is the more ambitious an organisation is the less it will say and misses the opportunity to truly connect with customers and other key stakeholders. As we will see in the next archetype, it is possible to have high ambitions, not yet fulfilled and communicate effectively.

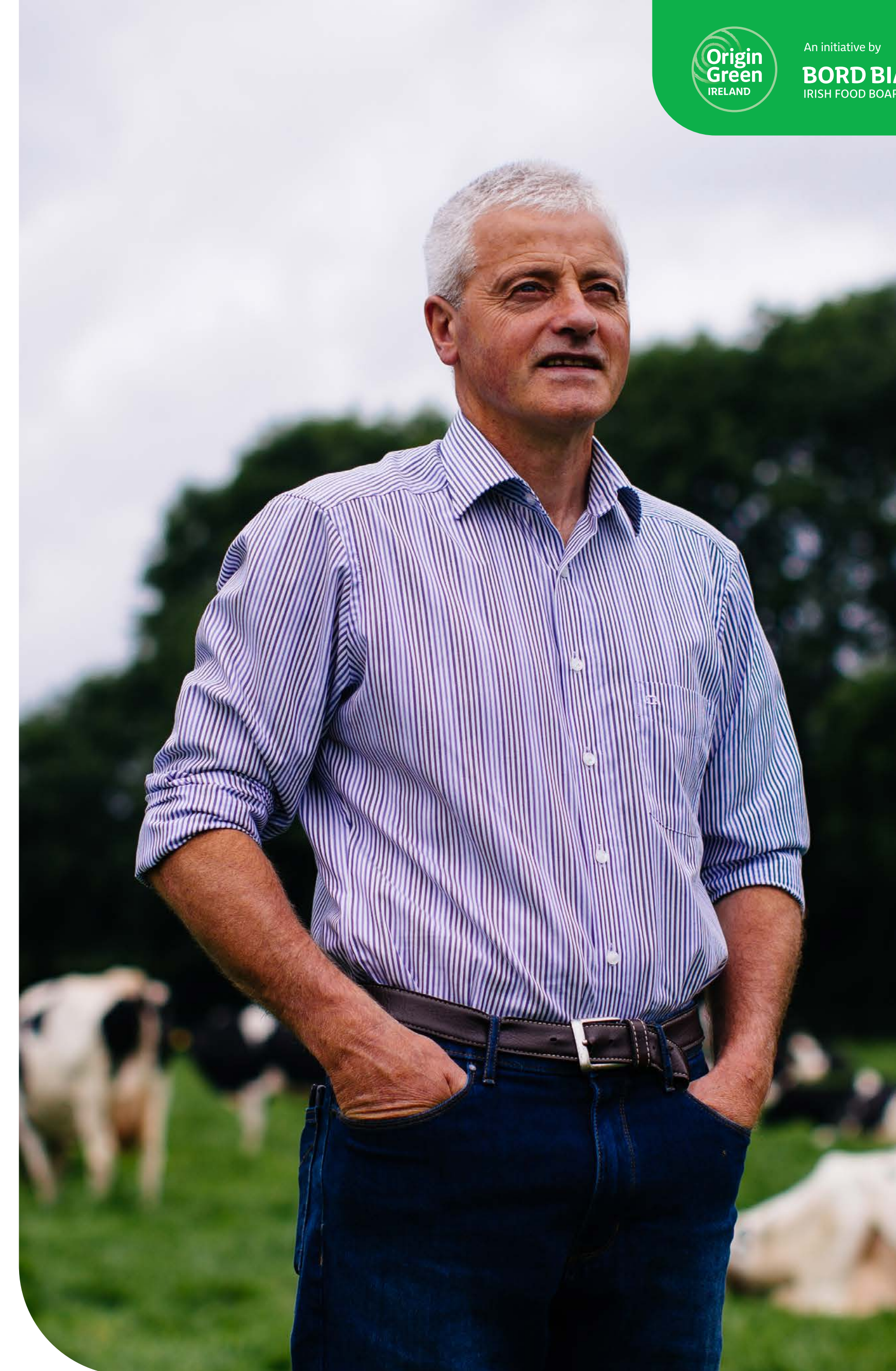




## Greenwashing Archetype:

### HONESTY

Whilst authenticity is the ideal communication state, only some organisations (especially larger ones) will find that all their actions align with their ambitions. When the timeline for solving the climate crisis is decades, there will almost always be more to do. The key here is to be true in communicating the ambition, the actions that are underway, the gap and how it will be closed. In this case, marketers and communicators need to constantly be in touch with all aspects of the business, tackling the sustainability challenges and how this is changing over time, tailoring communication accordingly.





# 3 Customers' and consumers' sustainability demands

Bord Bia's Danny Bowles outlines some of the key findings from the Global Sustainability Research on the Importance of Sustainability:

In the first half of 2021, Bord Bia conducted global research to better understand global sustainability demands around food and drink. The insights are designed to help understand the customer and consumer behaviours and demands around sustainability. This research helps the Irish food and drink industry to focus on the right sustainability priorities and arm it with the sustainability messages that resonate best. Interviews were conducted with consumers across 13 markets, customers across nine markets, NGOs, and those leading change in this space. It has shown that acceleration is set to continue. This means that businesses must prepare for the inevitable increased demands placed on them by customers and consumers.

**1. THERE ARE MANY DIFFERENT CONVERSATIONS GOING ON** - But what sustainability means and why it's essential does differ depending on who the audience is. There is a need to tailor your message to the audience. What is important to an NGO or a sustainability lead at a leading retailer differs from what is important to consumers. The former focuses on higher-order topics like carbon footprint and water quality. The latter thinks more about what is tangible, food and packing waste, and its origin. However, as we've already mentioned in Section 1, with Scope 3 targets getting set, what you do as a supplier on emissions will become vital for your customers and buyers.

51% of buyers say sustainability is "an integral part of the business"







**2 in 5 say sustainability is one of the most important factors when choosing a supplier**

**2. SUSTAINABILITY IS BECOMING A CORE PURCHASING CRITERIA** - While we can't say it's more important than price or quality, there is clear evidence that the sustainability of your production is essential to buyers - and you need to be able to prove your Origin Green credentials when communicating online as buyers search for suppliers, and in your pitch meeting.

72% of buyers say it's important to have suppliers with strong sustainability credentials but only 4 in 10 say that the majority of their suppliers have those credentials, therefore there is a significant opportunity gap for Irish suppliers who, thanks to Origin Green, do have those strong credentials. To achieve differentiation, make sure you communicate your membership of Origin Green clearly to suppliers and what that

means, i.e. you are part of a nationally consistent framework that guides your sustainability plan around core areas that are important to customers such as raw material sourcing, manufacturing processes and social sustainability.

Not only can you benefit from being selected as a supplier, but if you can demonstrate a strong sustainability mindset and willingness to share data with your customer, you can position yourself as a potential supply partner, availing of more security and longer-term contracts. We know that customers want to partner once they find suppliers with the right fit. There is a need to communicate proactively about what you're doing on sustainability and link it with your customers' sustainability plans. Key requirements include demonstrable evidence of shared topic commitment, data point openness and proof.



## Consumers put responsibility for improving food sustainability on the food producer above anyone else



Every market is unique, so if you would like to better understand your specific audience and their sustainability demands you can [download the full report here](#).



Similarly, consumers seek more. We need to consider what sustainability means to them, which differs across markets. But we need to understand that right now, they are struggling financially, so getting them to pay more for sustainability is not really possible; they fully expect producers to do the right thing, and not necessarily for more profit but because those who don't will lose share. Those who don't will lose out on market share. Our challenge is to communicate the value of sustainable production.

### 3. UNDERSTAND YOUR AUDIENCE

The implication from our consumer research is that right now it is most important to get your messaging right on the most relevant consumer topics, like waste, origin and welfare. But don't ignore the higher order topics and try and educate the consumer about the value of what you're doing on emissions. Recent research on The Consumer and Carbon that we have conducted shows that shoppers are desperate for clear messaging on carbon. They know how important it is, but current labelling and communication is frustrating them. Remember, consumer education will improve rapidly and soon they will be expecting on-pack and online messaging from all brands on carbon and more besides.



# 4 How to communicate sustainability

Chris Upton explains the Havas Genus Be Do Say model and outlines the current and future legislation concerning sustainability communications.

We are in a climate emergency leading to rapid changes in how we do business. And the scale and pace of change will only increase over the coming years. What is unprecedented is that these changes are being driven from all sides - by new legislation, market demand, stakeholders' expectations and resource costs. So, businesses must take a holistic approach when considering their marketing strategies.

When communicating sustainability, it is worth considering what sustainability is likely to mean in the eyes of regulators, your customers and consumers. For this handbook, we will assume we are communicating in markets committed to achieving net zero greenhouse gas emissions by 2050. The trend we are seeing is that local communications regulators are taking the view that any sustainability claims should be actions or activities that result in a reduction in or removal of carbon footprint. This can include changes to the product, supply chain or manufacturing processes, or consumption levels and behaviours.

As Origin Green members, you are positioned to market sustainability with a growth mindset. Building your strategies around how sustainability will grow your reputation, grow your effectiveness, grow your efficiency and grow your value. To achieve this, it is essential to identify and understand your brands' sustainability purpose. The purpose will be your business' true north, helping you establish your values and building out your story to grow your business in a meaningful way. And by meaningful, we mean in a way that helps bring your brand, business, consumers and customers a step closer to the needed systematic change.

**“The world is in the early stages of a sustainability revolution that has the magnitude and scale of the industrial revolution at the speed of the digital revolution”**  
Al Gore.





## 4 Your customers now expect brands and manufacturers to act sustainable

88%

Of consumers would switch to a more sustainable alternative.

77%

Think brands must act now for the good of planet and society.

The Compliance Institute survey also found that more than half (52pc) of people are aware of the practice of greenwashing, and that most (38pc) of these would avoid purchasing from companies which participate in it, with one in eight (12pc) actively doing so. As Origin Green members you can have the confidence to communicate and gain advantage over these other businesses.





4

# Using the Havas 'Be, Do, Say' model to build your communications strategy

**Be**

Set your ambition and purpose

**Do**

Commit to and track actions

**Say**

Communicate ambition and progress







## Uncovering your core purpose and the sustainability ambition of your business.

Your purpose and ambition are based on what is authentic and genuine to you as an organisation but also built from understanding where real change will happen.

Think about the net zero pathway for your sector.

What changes are required and when?

What is your desired role within the sector?

Do you wish to be an innovator or proactive follower?

What are your customers' and consumers' expectations? What do they value and expect from your business and your sector?

Many brands in recent years have set out big ambitions around sustainability. However, many failed to base these goals and claims on facts or the reality of their sector.

It is essential that your ambition is authentic but also credible to your business and your sector. With the rapid changes we are seeing, a brand saying they are "doing more" but not delivering on the change needed could be considered misleading regarding the actual sustainability impact both by regulators and consumers.

You want to set out an ambitious and defined commitment to change, not a slogan.





# Do

## Translating your commitment into real world actions

It is important to understand how your actions will create real impact. Your Origin Green plan is the perfect tool to define this path.

When working through the actions you intend to take, consider the published guidelines for your sector and the supported pathway to net zero. Build your actions and path based on science and always make sure that your “Be” remains your guiding purpose and principle when faced with tough decisions.

With Scope 3 emissions fast becoming the required standard, you should look at your path to success in a holistic way and consider the impacts across the whole lifecycle of your product.

We have taken a closer look at how sustainability is effecting consumer behaviour and how this in turn might influence what you do.

Consumers and customers are changing their behaviours in several ways in order to be more sustainable. Some consumers are rethinking how, and what they consume across categories, breaking habits and challenging beliefs. They are also Refusing to purchase in some sectors, moving out of categories for a period or permanently. These behavioral changes have already created new innovations and markets, for example the growth of meat and dairy alternatives. It is anticipated that Rethinking and Refusing will be where key future changes will be seen.

Reduce, Reuse, Recycle and Rot or compost are familiar to all of us in terms of the changes they have created across products and supply chain. However, we will continue to see innovations that tap in to changing consumers’ behaviours and encouraging greater uptake of sustainable practices. We can already see markets reacting to these signals, with examples being CO2e labelling and retailers taking action to reduce food waste.

Rethink

Refuse

Reduce

Reuse

Recycle

Rot





## Creating your messaging and communicating your ambition and your actions.

By taking a holistic approach, defining your ambition and building a credible path to sustainable success, you have all the elements you need to begin to build your story. A story that will be an important part of your brand's long-term path to growth.

This is often where the fear of greenwashing prevents businesses from communicating to a full and effective degree.

**A simple definition of Greenwashing is when communications activity makes companies appear more sustainable than they are in practice. This may be done intentionally or unintentionally, as is often the case.**

From a legal standpoint, consumer law prohibits any marketing that is misleading. But greenwashing can be quite nuanced and has been a challenge for regulators over the past few years. The Cambridge Institute of Sustainability Leadership issued guidance in 2022 to help.

They advised that you think about greenwashing in terms of a misleading effect, not dishonest intent. What is the understanding that the average consumer gets from communications? Something can be technically true, but if important content or context is left off it can be deemed misleading.

When creating your communications, always keep in mind that what you say will impact your reputation as a business and brand. Any vague claims will be difficult to support and may be called out. Think about the whole product's lifecycle as opposed to one action that has been taken. If you are communicating any future goals, they must be credible and have a clear roadmap in place.

A final consideration are the changing regulations in this space. Regulatory bodies in most markets are in the process of updating their rules in relation to communicating sustainability claims or ambitions. Their main goal is to remove the confusing, and in some cases misleading, information that has existed in the past. You'll find a list of some of these regulatory bodies in the Useful Links section of this handbook.





# 4

## Shades of Green

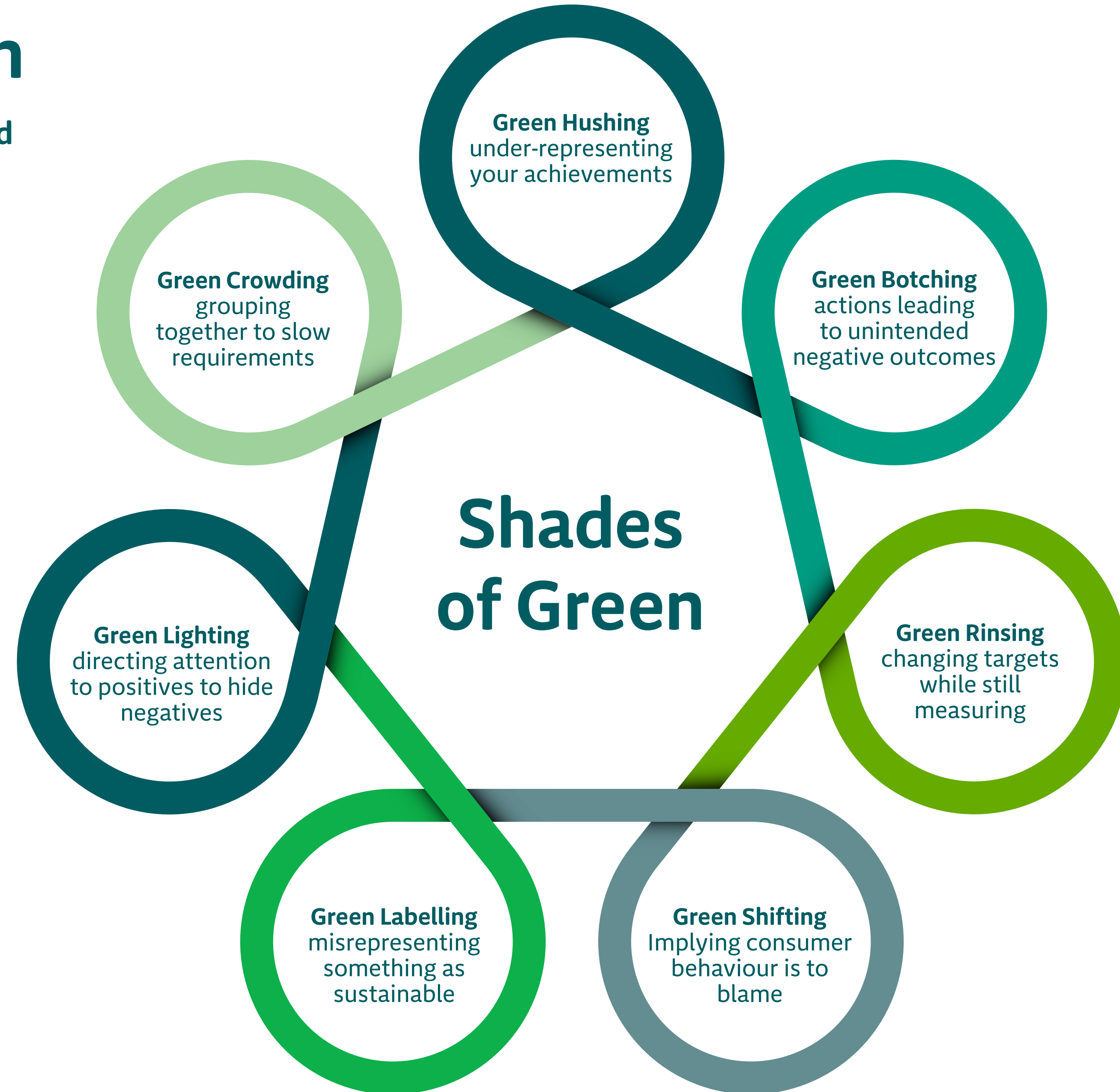
### The increasing terminology around greenwashing and what it means

Sustainability communication is complex, in part because it is a relatively new area.

Businesses, consumers and legislators are actively working to better understand the rules.

Many are trying to keep up and comply, while some are trying to bend the rules for gain. Out of this has sprung a number of terms that are starting to appear in reports and media commentary when speaking about greenwashing and overclaims.

Source: PlatetTracker.org





As a rule of thumb, we believe the recent Green Claims Code issued by the UK's Competition & Markets Authority is a very good benchmark to work to.

Claims must be clear and unambiguous.

Comparisons must be fair and meaningful.

Claims must be substantiated.

Claims must be truthful and accurate.

Claims must not omit or hide important relevant information.

Claims must consider the full life cycle of the product or service.

Now that you're ready to start sharing your sustainability story, here are some guiding principles when building your communication activity.

### Be bold, but never ambiguous

Talk about the great things you are doing with honesty and openness. Don't state or imply claims you can't back up and equally don't try to sugarcoat your efforts.

### Be impact oriented

Look at what is important within your sector and where your brand can make a credible and measurable difference.

### Be prepared to show behind the scenes

A huge part of communicating sustainability is showing customers your approach and what sits behind your products and brand. Tell them your story and give them an insight into your brand.

### Be people focused and accessible

Take customers on your journey and use plain language. Don't use technical jargon or complex modelling. Involve and make them part of your success.

### Be aware of all outcomes of your actions

Consider what you are advertising and the way you are advertising. Are you promoting carbon neutral practices, products and/or behaviours?

### Be present

Root your brand in your sustainable efforts and vice versa. It will take time and consistency to fully engage your audience in your story.

Start your story today by building out your communications plan from your Origin Green plan. Capture your own 'Be, Do, Say' on one page and let that be the foundation for all your communications to ensure alignment, consistency and compliance.



## 4 Current legislative environment

In Ireland, environmental claims are subject to the Code of Standards for Advertising and Marketing Communications in Ireland and the Consumer Protection Act 2007. These are enforced by the ASAI and the CCPC. In the UK, it is the ASA and the Competition & Markets Authority. Similar bodies exist in most other markets.

The ASA updated their guidance in February 2023 to cover carbon neutral and net zero claims in advertising which are worth noting. The update was due to the low understanding amongst consumers and lack of consensus around the meaning of carbon neutral and net zero claims amongst consumers.

### Key outtakes from this guidance are:

- Avoid using unqualified carbon neutral, net zero or similar claims.
- Ensure to include accurate information about the degree to which carbon emissions are being actively reduced or claims are based on offsetting.
- Claims based on future goals relating to reaching net zero or achieving carbon neutrality should be based on a verifiable strategy to deliver them.
- Where claims are based on offsetting, they should comply with the usual standards of evidence for objective claims set out in this guidance, and information about the offsetting scheme should be provided.
- Where it is necessary to include qualifying information about a claim, that information should be sufficiently close to the main aspects of the claim for consumers to be able to see it easily and take account of it before they make any decision.





# 4 The regulatory landscape is evolving

	EU	UK	US
<b>Relevant Regulations</b>	EU Green Claims Directive (in negotiation stage) (linked to the Corporate Sustainability Reporting Directive)	UK Green Claims Code (2021) - (regulated by the Competition Markets Authority & the Advertising Standards Authority)	US Green Guides (updated 2022) (regulated by the Federal Trade Commission)
<b>Scope</b>	B2C	B2C and B2B	B2C and B2B
<b>Structure</b>	Amends existing consumer protection rules and introduces new provisions for substantiating, communicating and certifying claims (banning general claims and self-certification).	General principles, examples and guidance.	General principles, examples and guidance.
<b>Summary</b>	Companies will be required to ensure the reliability of their voluntary environmental claims, to be independently verified and proven, required to identify environmental impacts relevant to their products, must be specific to the lifecycle. Sets out a detailed framework to substantiate claims based on scientific evidence and must be verified by a third party.	Sets out what businesses need to do to make sure their claims aren't generic, misleading, ensures they are qualified, substantiated and significant, and consider the full lifecycle of the product or service.	Clear principles for businesses to avoid general claims, misleading without qualification; claims must be qualified and significant. Ensures marketers have a reasonable basis for their claims.
<b>Enforcement</b>	EU states required to implement rules into national law. Offending companies will be subject to penalties ranging from fines to confiscation of revenues, and temporary exclusion from public procurement processes and public funding.	Not directly enforceable but can launch investigations, take enforcement actions and UK government planning to increase powers to the CMA, including fines or civil or criminal proceedings.	Not directly enforceable but the Federal Trade Commission can launch investigations and civil proceedings leading to enforcement actions.



# 4 EU Green Claims Directive

A study by the European Commission in 2020 highlighted that 53.3% of examined environmental claims in the European Union (EU) were found to be vague, misleading or unfounded, and 40% were unsubstantiated. This led to a proposal for a Directive on substantiation and communication of explicit environmental claims (the so-called “Green Claims Directive”) which was published on 22 March 2023.

The proposed Green Claims Directive aims to establish the first set of detailed EU rules for the substantiation of voluntary green claims and, by extension, regulate the use of environmental claims in marketing communications in Europe. The proposal includes:

- clear criteria on how companies should prove their environmental claims and labels;
- requirements for these claims and labels to be checked by an independent and accredited verifier; and
- new rules on governance of environmental labelling schemes to ensure they are solid, transparent and reliable
- The proposed Directive furthermore requires companies to provide clear and accurate information about the environmental impact of their products or services. It also prohibits unsubstantiated or vague environmental claims
- Offending companies will be subject to penalties ranging from fines to confiscation of revenues, and temporary exclusion from public procurement processes and public funding. Furthermore, there is also a great risk of reputational damage and tarnishing of a company’s image if a product or service offered as green turns out to be non-compliant.





# 4 Unpacking the Directive

4

The proposal forms part of the EU's New Consumer Agenda and Circular Economy Action Plan which aim to reform consumer law across the EU, increase sustainable production of goods and services and empower European consumers to play an active role in the green and digital transition. The aim of the proposal is to ensure that environmental claims are reliable and accurate. Once enacted, the Green Claims Directive will create harmonised standards on substantiation of environmental claims and environmental advertising across the EU.

*The proposal defines "an environmental claim" as "any message or representation, which is not mandatory under Union law or national law, including text, pictorial, graphic or symbolic representation, in any form, including labels, brand names, company names or product names in the context of a commercial communication, which states or implies that a product or trader has a positive or no impact on the environment or is less damaging to the environment than other products or traders, respectively, or has improved their impact over time".*

It is envisaged that the Green Claims Directive will only apply to voluntary claims made by businesses to consumers, and not to mandatory disclosures or labelling requirements under separate EU laws.

**"...not mandatory under Union law or national law"**  
**May suggest sustainability measures you are required to take should not be positioned as a comparative sustainability claim.**

**"...graphic or symbolic representation, in any form"**  
**May suggest that brand names, packaging artwork or images used in communications may be considered a claim and therefore require substantiation.**

**"...states or implies..."**  
**May suggest a degree of subjectivity or interpretation at a local compliance agency level.**



## 4

# General principles of the EU Green Claims Directive

The jungle of false environmental claims will end as only certified and substantiated ecological claims will be permitted.

- **Introduces** clear criteria on how companies should prove their environmental claims and labels
- **New** requirements for these claims and labels to be checked by an independent and accredited verifier
- **Ban** on generic claims (e.g. environmentally friendly or green)
- **Ban** on claims based on offsetting (e.g. carbon neutral)
- **Must** be supported by substantiated and quantified using science-based targets
- **Must** include a detailed and realistic implementation plan to achieve this future environmental performance
- **Requires** companies to provide clear and accurate information about the environmental impact of their products or services
- **Bans** labels unless verified by third-party scheme





## 4 Proposed enforcement of the directive

Member States will be required to ensure that minimum requirements for substantiation and communication are respected by businesses when making environmental claims. Claims must be substantiated with scientific evidence identifying the relevant environmental impacts and any trade-offs between them. Claims regarding the environmental impact of a product along the life-cycle or climate related claims will be subject to more stringent requirements. The accuracy of any explicit environmental claims will need to be reviewed at least once every five years from the date of the substantiating study. The information relied upon as part of the environmental assessment available to consumers.

It is proposed that there will be some exemptions for small business - in particular, the substantiation requirements do not apply to businesses with fewer than ten employees and annual turnover of less than €2m unless they choose to participate in approved environmental labelling schemes.

Under the Green Claims Directive, national regulators will be responsible for setting up verification and enforcement processes to be performed by independent and accredited verifiers. The proposal envisages that member states may designate the same regulator as for the Unfair Commercial Practices Directive (UCPD) which in Ireland is the Competition and Consumer Protection Commission (CCPC).

The proposal envisages that national regulators will be equipped to instigate investigations, impose sanctions and pursue judicial proceedings against those in breach of the Green Claims Directive - powers which the CCPC already has in respect of other consumer protection legislation. Other specifically envisaged powers include issuing “corrective requests” requiring businesses to correct or cease their environmental claim or within 30 days.





# 4 Corporate Sustainability Reporting Directive (CSRD) and Greenwashing

- CSRD demands that EU companies report in more detail and more transparently about the impact their businesses have on the environment, human rights and social standards.
- Officials have designed the new rules partly to end greenwashing. To do this they will introduce a general EU-wide audit assurance requirement for reported sustainability information.
- The CSRD requires sustainability information to be published in an entity's management report and not a separate, standalone report.
- Will come into affect for 2025 reporting period.





4

# COP27 Report on greenwashing

**Net Zero pledge must be a commitment by the entire business, made public and supported by the leaders.**

**Net Zero claims are incompatible with deforestation and other environmentally destructive activities.**

**Net Zero claims need to reflect the whole value chain and be science based.**

**Net Zero claims must be supported by publicly shared transition plans on what is actually being done to meet targets.**



5

Where to communicate sustainability

As with any communications, there are several factors to consider when planning out where you will communicate your message. This includes:

- Your budget
- Your market
- Your objectives
- Your target audience
- The life stage of your brand
- Previous campaign performance and learnings

Another important factor to consider is the individual characteristics of different channels. Depending on your specific circumstances and story, different channels can help in different ways.

When communicating sustainability, it is also important to consider that the channels you select will have different environmental and social impacts. Therefore, you should also factor this into your final media choices.

We have created a simple table to help navigate the right media choices for you.



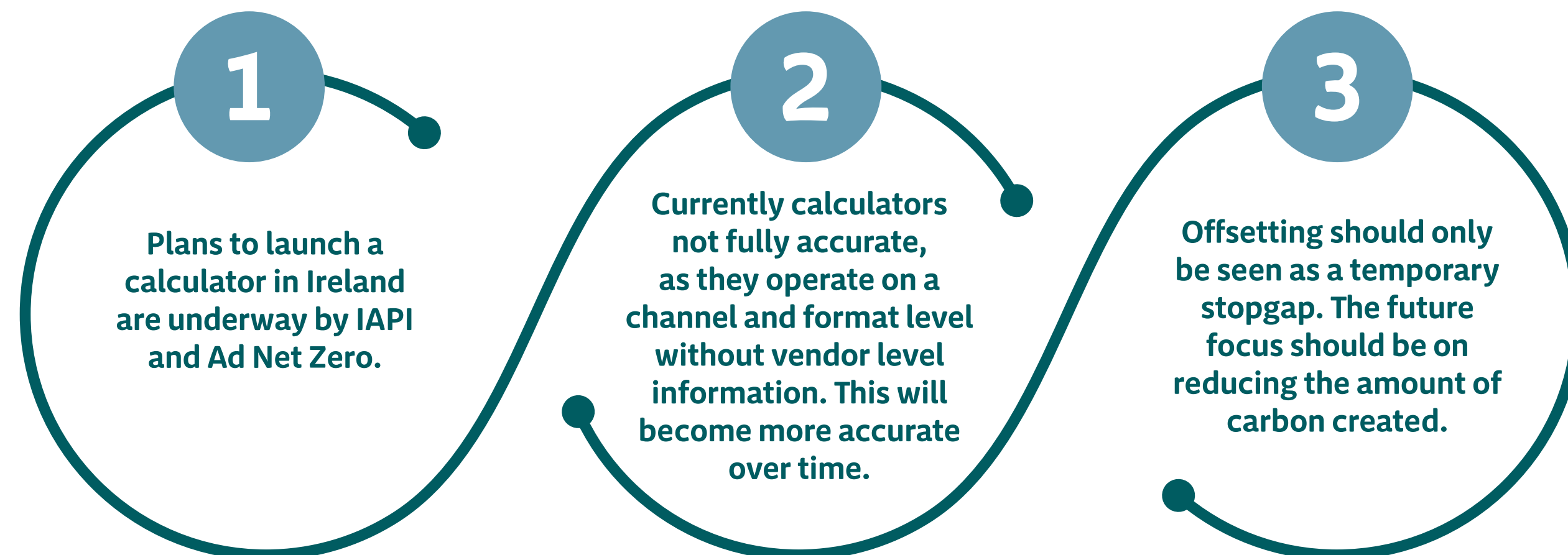
CHANNELS	TV / ONLINE VIDEO	RADIO / AUDIO
BEST FOR	Emotive advertising Grabbing attention Building awareness	Trusted and credible High reaching Storytelling
WATCHOUTS	High carbon footprint from production Highest carbon format in delivery of online media	Energy consumed in transmission and receiving of signals / streams

CHANNELS	SOCIAL MEDIA	ONLINE DISPLAY
BEST FOR	Engaging with communities Targeted messaging Testing messaging	Highly targeted Reach in to relevant contexts
WATCHOUTS	Two way feedback Ethical considerations Data consumption	High data loads can create energy waste especially if not targeted correctly

CHANNELS	OOH (Out Of Home)	PRINT
BEST FOR	Location specific targeting Making a statement. Innovation	Highly targeted Reach in to relevant contexts
WATCHOUTS	Digital outdoor has been targeted as a high energy consuming medium  Waste created in physical formats also	High data loads can create energy waste especially if not targeted correctly



Your ambition as a sustainable Marketer will be to look to eliminate any wastage within your communications. Carbon Calculators (such as the one provided by the IPA in the UK) can help you understand the carbon generated in your media or communications plan.



## Best practice

In the absence of a Carbon Calculator for any advertiser looking to reduce carbon in their plan, the focus should be on reducing wastage in digital campaigns due to the high data and energy use of digital campaigns. We have included some best practice tips for how to achieve this.

### ✓ Use frequency capping

Use frequency capping wherever possible across the campaign. This will drive efficiency for audiences, campaigns and carbon consumption.

### ✓ Reduce video lengths

Consider reducing video length - a 15-second format is likely half the carbon weight of a 30-second format.

### ✓ Reduce high carbon formats

Reduce high-carbon formats and consider the impact of autoplay or unskippable formats and identify ways to reduce unnecessary data loads in the plan. Work with a smaller number of Supply Side Platforms, which will reduce supply chain energy consumption.

### ✓ Reduce data waste

Each non-viewable impression creates excess data waste and has an ecological cost. All the actors in the supply chain need to align. Everyone needs to be invested in a reduction mindset - from planners to vendors to clients.



# 6 Do's & Don'ts

## Do

- ✓ Empower customers and consumers to make more sustainable choices.
- ✓ Share your journey and signpost your progress to demonstrate your commitment.
- ✓ Think beyond your product and look at behaviour change in your sector.
- ✓ Make it easy for customers to understand the full and real impact of your actions.
- ✓ Align with partnerships, initiatives or causes that are authentic for your brand.

## Don't

- ✗ Make tokenistic gestures if the sustainability benefit is misleading or negligible.
- ✗ Trivialise the scale of an issue.
- ✗ Communicate claims without robust verification and evidence from credible experts.
- ✗ Frame actions as sustainable if they're not.
- ✗ Be insensitive to unsuitable partnerships.





# 7 Key tenets from COP27

There are 4 key tenets that emerged from COP27 that you should consider when building any future communications plan around Net Zero claims.

01

Net Zero pledge must be a commitment by the entire business, made public and supported by the leaders.

02

Net Zero claims are incompatible with deforestation and other environmentally destructive activities.

03

Net Zero claims need to reflect the whole value chain and be science based.

04

Net Zero claims must be supported by publicly shared transition plans on what is actually being done to meet targets.



# 8

## Understanding the Consumer and Carbon: Cutting through the Carbon Jargon

**Grace Binchy**

Insights and Trends Specialist, Bord Bia

As the targets food and drinks companies face to become net zero intensify and with a corresponding growing range of labelling schemes and communications emerging around carbon, Bord Bia were keen to understand how consumers navigate this world, with the purpose of bringing clarity to the consumer view of the current and future path of carbon messaging.

We wanted to find out: What does the consumer understand about carbon, carbon footprinting, their carbon impact, and how do we engage consumers along the way? What are the messages that we need to create to connect with them and bring them on this journey?

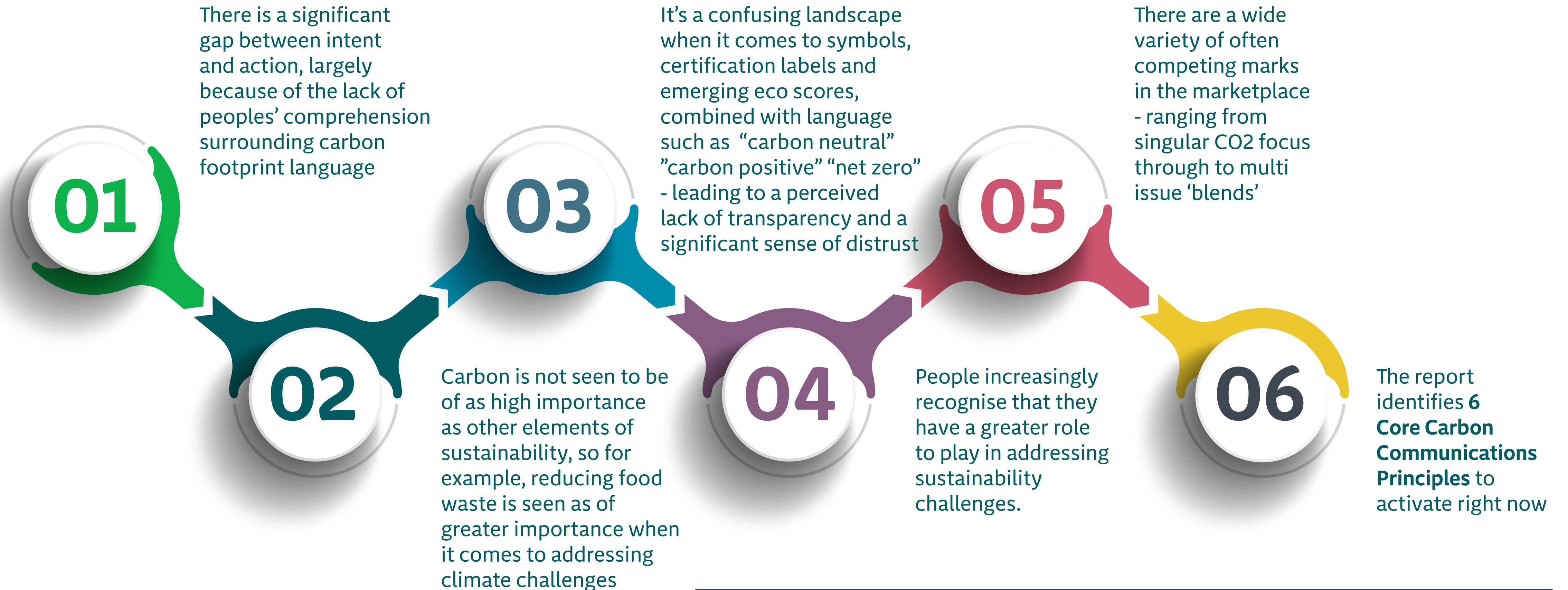
Bord Bia commissioned an extensive piece of research involving a multifaceted approach, engaging with a range of experts including Sustainability Works who provided insight around the legislation and regulation emerging around carbon, Practical Semiotics who provided an overview of the language and communications landscape and Empathy and Futavista who built the research conducting a quantitative survey across 3 markets including Ireland, UK and Germany (with a nat rep sample of 1,000 per market) supported with in-depth qualitative work with extensive use of ethnographics.

**What does the  
consumer understand  
about carbon, carbon  
footprinting, their  
carbon impact, and how  
do we engage consumers  
along the way?**





# 8 Here are some key takeaways from the study:



For more details on the report contact my colleagues and I at [thinkinghouse@bordbia.ie](mailto:thinkinghouse@bordbia.ie). If you are interested in availing of a workshop of this study for your marketing teams please contact me directly [grace.binchy@bordbia.ie](mailto:grace.binchy@bordbia.ie)



# 9 Useful links

## BORD BIA RESOURCES

Communicating Sustainability Resources:  
[origingreen.ie/resources/communicating-sustainability/](https://origingreen.ie/resources/communicating-sustainability/)

Bord Bia Marketing Hub:  
[bordbiemarketinghub.ie/](https://bordbiemarketinghub.ie/)

Global Sustainability Insights Portal:  
[bordbia.ie/industry/insights/global-sustainability-insights/](https://bordbia.ie/industry/insights/global-sustainability-insights/)

Havas Genus  
[havasgenus.com](https://havasgenus.com)

## COMMUNICATIONS REGULATORY BODIES



**IRELAND**  
Advertising Standards Authority of Ireland  
Broadcasting Association of Ireland

[asai.ie](https://asai.ie)  
[bai.ie](https://bai.ie)



Advertising Standards Authority  
Clearcast

[asa.ord.uk](https://asa.ord.uk)  
[clearcast.co.uk](https://clearcast.co.uk)



ARPP

[arpp.org](https://arpp.org)



Deutscher Werberat  
Wettbewerbszentrale

[werberat.de](https://werberat.de)  
[wettbewerbszentrale.de](https://wettbewerbszentrale.de)



European Advertising Standards Alliance

[easa-alliance.org](https://easa-alliance.org)



Federal Trade Commision

[ftc.gov/business-guidance/advertising-marketing](https://ftc.gov/business-guidance/advertising-marketing)



State Administration of  
Market Regulation (SAMR)

[en.nim.ac.cn/node/647](https://en.nim.ac.cn/node/647)

**CARBON CALCULATOR**  
IPA Media Carbon Calculator

[ipamediaclimatecharter.co.uk](https://ipamediaclimatecharter.co.uk)





# 10 Authors



**Sharon Colgan**

Programme Marketing Manager,  
Origin Green, Bord Bia



**Mike Barry**

Sustainability Advisor



**Chris Upton**

CEO, Havas Dublin  
Consultant, Havas Genus



**Grace Binchy**

Insights and Trends Specialist,  
Bord Bia



**Spiro Comititis**

UK&I Lead Consultant,  
Havas Genus



**Fiona Bain**

Senior Strategic Planner,  
Havas Dublin



**Adam Taylor**

Head of Media Experience  
Havas Media Ireland



**Danny Trench Bowles**

Strategic Insight & Planning  
Specialist, Bord Bia Thinking House



# Ending Comments

**Sharon Colgan**

Programme Marketing Manager, Origin Green

We hope this handbook and webinar recordings prove useful to you and your teams as you navigate your way towards understanding best practice in sustainability communications, and most importantly that it inspires you to share your company's and brand's sustainability stories.

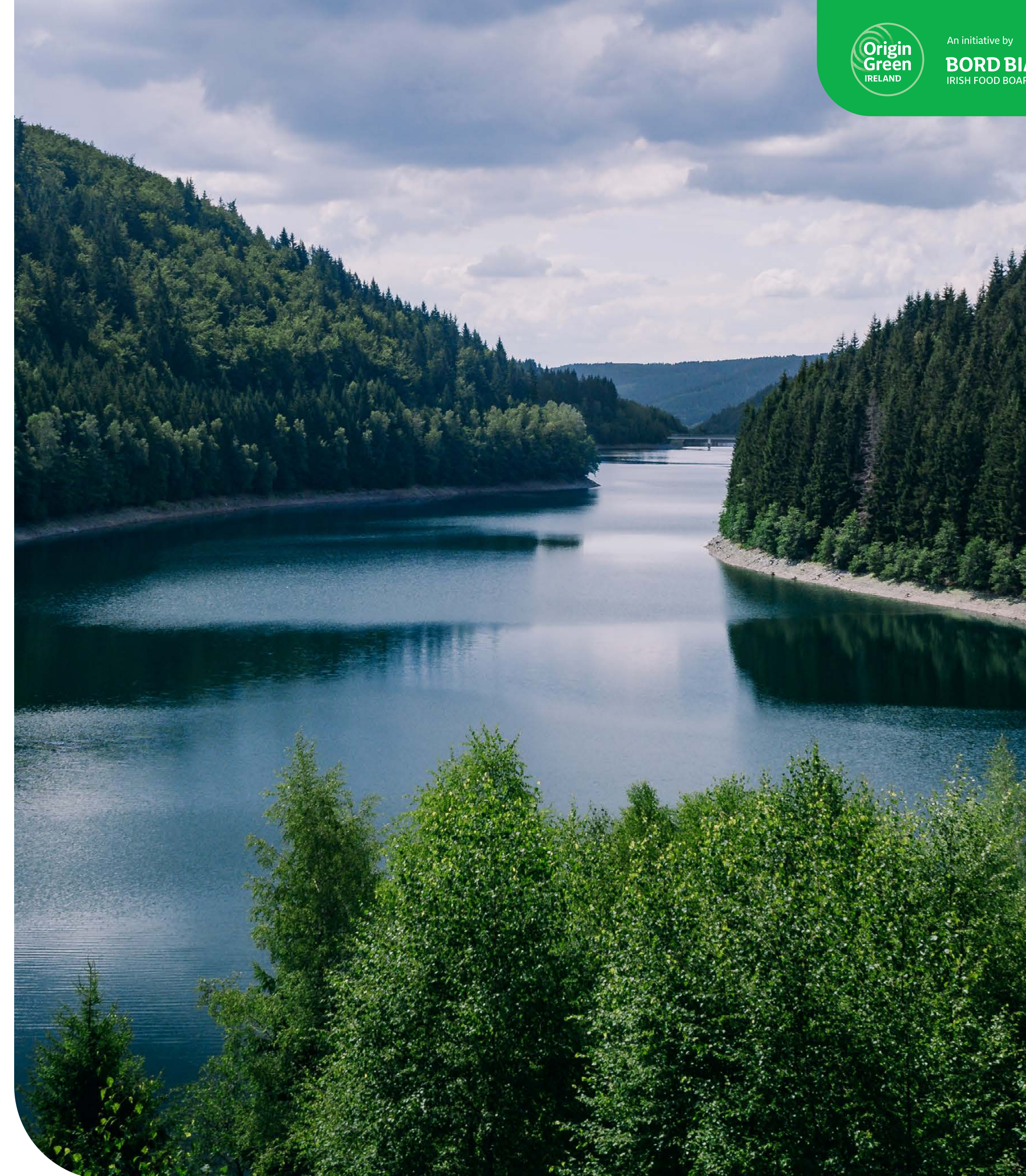
## Further supports are being developed in this space:

- Bord Bia Thinking House study on 'The Consumer and Carbon' to be launched 15th February 2023
- Bord Bia's Origin Green and Client Capability teams are working together to address ongoing client company needs for further training and workshops around sustainability communications

For further information on upcoming supports please regularly check in on Bord Bia's events listings at:

[www.bordbia.ie/industry/events/upcoming-events/](http://www.bordbia.ie/industry/events/upcoming-events/)

In the meantime, if you or your team would like to discuss how best to communicate your company's sustainability actions and commitments, please get in touch with me at [sharon.colgan@bordbia.ie](mailto:sharon.colgan@bordbia.ie) or **01 618 5515**





# Appendix EU Green Claims Directive - Communication of explicit environmental claims

1. Member States shall ensure that a trader is required to communicate an explicit environmental claim in accordance with the requirements set out in this Article.
2. Explicit environmental claims may only cover environmental impacts, environmental aspects or environmental performance that are substantiated in accordance with the requirements laid down in Articles 3, 4 and 5 and that are identified as significant for the product or trader concerned in accordance with Article 3 paragraph (1) point (c) or (d).
3. Where the explicit environmental claim is related to a final product, and the use phase is among the most relevant life-cycle stages of that product, the claim shall include information on how the consumer should use the product in order to achieve the expected environmental performance of that product. That information shall be made available together with the claim.
4. Where the explicit environmental claim is related to future environmental performance of a product or trader it shall include a time-bound commitment for improvements inside own operations and value chains.
5. Explicit environmental claims on the cumulative environmental impacts of a product or trader based on an aggregated indicator of environmental impacts can be made only on the basis of rules to calculate such aggregated indicator that are established in the Union law.
6. Information on the product or the trader that is the subject of the explicit environmental claim and on the substantiation shall be made available together with the claim in a physical form or in the form of a weblink, QR code or equivalent.  
That information shall include at least the following:  
(a) environmental aspects, environmental impacts or environmental performance covered by the claim;  
(b) the relevant Union or the relevant international standards, where appropriate;  
(c) the underlying studies or calculations used to assess, measure and monitor the environmental impacts, environmental aspects or environmental performance covered by the claim, without omitting the results of such studies or calculations and, explanations of their scope, assumptions and limitations, unless the information is a trade secret in line with Article 2 paragraph 1 of Directive (EU) 2016/943 112 ;  
(d) a brief explanation how the improvements that are subject to the claim are achieved;  
(e) the certificate of conformity referred to in Article 10 regarding the substantiation of the claim and the contact information of the verifier that drew up the certificate of conformity;  
(f) for climate-related explicit environmental claims that rely on greenhouse gas emission offsets, information to which extent they rely on offsets and whether these relate to emissions reductions or removals;  
(g) a summary of the assessment including the elements listed in this paragraph that is clear and understandable to the consumers targeted by the claim and that is provided in at least one of the official languages of the Member State where the claim is made.
7. The requirements set out in paragraphs 2, 3 and 6 shall not apply to traders that are microenterprises within the meaning of Commission Recommendation 2003/361/EC unless they request the verification with the aim of receiving the certificate of conformity in accordance with Article 10.
8. Where the substantiation of certain environmental impacts, environmental aspects or environmental performance is subject to the rules established in delegated acts referred to in Article 3, paragraph 4 (a) and paragraph 4 (c), the Commission may adopt delegated acts in accordance with Article 18 to supplement the requirements for communication of explicit environmental claims set out in Article 5 by specifying further the information that can be or shall be communicated regarding such environmental impacts, environmental aspects or environmental performance, so as to make sure that the consumers are not misled.



