

## SUSTAINABILITY CODE

### 1. Compostable

Compostable refers to the characteristic of a product or packaging that allow it to break down into or otherwise become part of usable compost in an appropriate composting facility or device.

- 1.1 No claims may be made about the compostability of a product or packaging unless the claims can be substantiated in terms of Clause 4.1 of Section II that the whole product or packaging will break down into, or become part of, usable compost in a safe, timely manner in an appropriate home, municipal or industrial composting facility or system where the typical conditions of composting can be consistently obtained.
- 1.2 Advertising claims about compostability should clearly disclose the type of composting facility required (home, municipal or industrial). Unless the product or packaging is proven to be compostable in all types of facilities, the compostable claim needs to be qualified.
- 1.3 Claims of “home compostability” should not be made if home composting requires the use of tools or equipment beyond a home composting unit or involves the use of specialised skills.
- 1.4 The claim must clearly indicate whether the whole product and packaging, or only part of, or one of the components, is compostable. If the compostable component requires disassembly by the user before composting, this should be indicated, for example: “Remove the plastic film before composting”.
- 1.5 Advertisers should clearly and prominently qualify any limitations around the compostability of the product or packaging.
- 1.6 A compostability claim should not be made if the composting process will negatively and appreciably affect the environment; compromise the recycling waste stream; release substances in amounts harmful to the environment; reduce the overall quality of compost; affect the ability to form usable compost; or reduce the rate of composting.

### 2. Degradable

Degradable refers to a characteristic of a product or packaging that, in specific conditions, allows it to break down into elements known to nature within a given time.

- 2.1 No advertisement may make claims about the degradability of a product or packaging unless the degradable claim can be substantiated in terms of Clause 4.2.1 of Section II, that the whole product or package will, within a reasonably short period of time, break down and return to nature.
- 2.2 Advertising claims about the degradability of products or packaging should be qualified clearly and prominently to avoid deception about:
- 2.2.1 the ability of the product or package to break down in environments where it is commonly disposed of (landfills, incinerators and recycling facilities) as these do not provide ideal conditions for degradation.
  - 2.2.2 the rate and extent of degradation.
- 2.3 Advertising claims about degradability of a product or packaging may only be made if the by-products of degradation do not contain or release substances in amounts harmful to the environment.
- 2.4 Advertising claims regarding circumstances of disposal of products and packaging that claim to be degradable should:
- 2.4.1 state if the degradability claim relates to the whole product and all of the packaging or just part of it. If the consumer is required to separate or disassemble components before degradation can occur, clear directions for separation should be provided.
  - 2.4.2 clearly indicate which waste stream each component is intended for, if the product is made of multiple components for example “PLA Bottle – compostable and Closure – recyclable”.

### **3. Recyclable**

Recyclable: A characteristic of a product, component or packaging enabling it to be diverted from the waste stream through available processes and programmes, and to be collected, processed and returned to use in the form of raw materials or products.

- 3.1 No claims can be made about the recyclability of a product or packaging unless the claims can be substantiated in terms of Clause 4.1 of Section II that the product or packaging can be diverted from the solid waste stream through recycling or ‘take-back’ programmes and collected, processed and manufactured into another useful product.

- 3.2 Recyclable claims should clearly specify whether the product, packaging or only one of its components is recyclable. If the whole item is not recyclable, it should be clear which parts of the product or packaging are recyclable.

#### **4. Recycled Content**

Recycled Content: Recycled content refers to the portion of a product made from materials recovered or otherwise diverted from the waste stream, either during the manufacturing process (pre-consumer) or after consumer use (post-consumer).

- 4.1 No advertisement may make claims for the recycled content of the product or packaging material unless it is composed of materials that have been recovered or otherwise diverted from the waste stream, either during the manufacturing process (pre-consumer) or after consumer use (post-consumer).
- 4.2 When making claims about recycled content, the percentage of recycled content should be clearly stated. This can be presented as a written statement or a percentage number displayed inside or next to the mobius loop symbol, for example, *"This product is made of 30% recycled content"*. Avoid using *"up to"* a specified percentage of recycled content- claim the 'minimum of' percentage of recycled content instead. The mobius loop without a percentage shall be interpreted as claim of recyclability.
- 4.3 Recycled content claims should clearly indicate which 'part' the recycled content claim refers to (product or packaging). Unless the whole product is made of recycled content, a percentage number is needed to qualify the claim. If a non-recycled product has been packaged in recycled materials, this should be clearly stated.

#### **5. Circularity, Designed for Disassembly, and Extended Product Life**

Circularity refers to the concept of "circularity" or a "circular economy" is based on reducing waste through actions such as sharing, leasing, reuse, repair, refurbishment and recycling to improve management of resources, reduce waste, and reduce climate impacts. Definitions of the concept of the circular economy continue to evolve.

Designed for Disassembly refers to a characteristic of a product's design enabling and simplifying the process of taking apart of an assembled product into constituent components, parts and/or materials at high quality level during or at the end of its useful life in a way that allows product/material reutilisation via end-of-life options such as reuse, repair, refurbishing, remanufacturing or recycling.

Extended Product Life refers to product designed to provide prolonged use, based on improved durability and appropriate material choice, the presence of a feature enabling it to be upgraded, maintained, or repaired and resulting in reduced resource use or reduced waste.

## **5.1 Circularity**

- 5.1.1 The advertiser must ensure that claims of circularity are based on a thorough assessment and must clearly define what is meant by such claims, disclosing the basis and methodology of the claim.
- 5.1.2 The advertiser should not imply that a product or process is "circular" without substantiation that includes the specific aspects of circularity, such as reuse, repair, refurbishment, or recycling capabilities.

## **5.2 Designed for Disassembly**

- 5.2.1 The advertiser must only claim that a product is designed for disassembly if no specialised tools or expertise are required for disassembly, and clear information on how to disassemble and manage the parts post-disassembly is provided to the consumer.
- 5.2.2 The claim should also specify who is responsible for disassembly, such as the consumer or a specialist.
  - If a consumer, then facilities need to be conveniently available to process the components and part of the product after it has been disassembled. If no facilities are available, the claims should be qualified.
  - If a specialist, then collection or drop-off facilities should be conveniently available to a reasonable proportion of consumers in the product's area of sale. If no collection or drop-off facilities are conveniently available, the claim should be qualified.
- 5.2.3 When promoting products designed for disassembly, the advertiser should specify which parts of the product can be reused, recycled, or recovered, and the process for each, ensuring transparency and consumer understanding.

## **5.3. Extended Life Product**

- 5.3.1 The advertiser must substantiate claims of extended product life in terms of Clause 4.1 of Section II with verifiable evidence demonstrating improved durability or upgradability that results in reduced resource use or diverted from the waste stream. Comprehensive records and test data of the durability of the product must be maintained to substantiate and support this claim.

- 5.3.2 Where a claim of extended life is dependent on upgrades, specific information on how to achieve the required upgrade (such as routine service or maintenance) must be clear and accessible.
- 5.3.3 Advertisers must specify when making extended life claims whether they are comparing their product to a competitor's, an earlier version of their own product, or a substitute for similar products. An extended life claim must not only identify the product with which the comparison is being made but also specify the feature that extends the life of the product.

## **6. Refillable/Reusable**

Refillable refers to a characteristic of a product or packaging that can be filled with the same or a similar product more than once, in its original form and without additional processing except for specified requirements such as cleaning or washing.

Reusable refers to a characteristic of a product or packaging conceived and designed to accomplish within its anticipated life cycle more than one application, rotation or use for the same purpose for which it was conceived.

- 6.1 No product or packaging shall be claimed to be reusable or refillable unless the product or packaging can be reused or refilled (with the same or similar substance more than once) for the same or similar purpose and without needing additional processing (except for specified requirements like cleaning or washing).
- 6.2 If there are any limitations on the number of times the product or packaging may be reused or refilled, this needs to be clearly disclosed.

## **7. 'Free-Of...' Claims**

"Free-of" refers to claims that a product does not contain a particular ingredient or component, e.g. "BPA-Free".

- 7.1. All 'free-of' or '...free' claims should be substantiated with reliable scientific evidence or established testing methodologies in terms of Clause 4.1 of Section II that the specified substance does not exceed levels greater than those which can be found as an acknowledged trace contaminant or background level and that the claimed substance was not intentionally added.

- 7.2. Advertisers must not make claims about the absence of substances that are no longer used or were never in the product category (example 'Pesticide-free' for claims on organic products), were only ever present at background levels, are not historically associated with the product category, and/ or if the use of the substance is prohibited by regulations.
- 7.3. Claims such as "Microplastic-free" can only be used if the advertiser can provide reliable evidence that the product meets standards for degradability in the relevant disposal environment (that the elements return to nature).

## **8. Carbon Footprint, Carbon Offset, Carbon Neutral; Carbon Negative; Net Zero; Climate Positive**

**Carbon Footprint:** A "carbon footprint" is a way of reporting the impact on climate change from a product, service, or company's business operations. A full assessment would evaluate all aspects, from raw material extraction and processing to actual use and product end-of-life (commonly known as "cradle to grave"), of all greenhouse gas (GHG) emissions.

**Carbon Offsets:** Carbon offsets generally relate to reductions from other actions designed to capture carbon, like tree planting, methane capture and other actions, which may often take place outside the actual operations of the business or the location of operation. "Offsets" or credits may be purchased in the marketplace and traded to individuals or businesses in an effort to reduce the "carbon footprint."

**Carbon Neutral:** Carbon neutral claims are understood to mean that the net carbon footprint is zero, but in many cases, zero carbon contributions, neutral carbon, carbon negative or climate positive benefits can still only be achieved using offsets, removals or credits. The science of calculating carbon or overall climate impacts associated with emissions of all GHGs continues to evolve.

**Net Zero:** Net zero refers to an overall balance between the amount of GHGs produced and the amount removed from the atmosphere. Net zero is reached when the amount we add is no more than the amount taken away. It typically involves both emission reduction strategies and carbon removal approaches for residual emissions that cannot be eliminated.

- 8.1 Advertisers should either state that the product's carbon footprint is zero or specify which stages of the product life cycle have been offset. Advertisers must ensure that any carbon-related claim is substantiated by reliable scientific evidence in line with Clause 4.1 of Section II, recognising that the science continues to evolve.
- 8.2 Claims should not imply broader environmental benefits or no adverse environmental impact unless supported by reliable scientific evidence. Advertisers must avoid suggesting that the product, service,

or company has undergone a complete Life Cycle Analysis (LCA) of all GHG emissions unless this has been conducted.

8.3 All claims related to measures taken to limit, reduce, remove or offset greenhouse gas emissions (GHGs) from all stages of the product lifecycle and within the product system must be substantiated by appropriate accounting or reliable scientific methods in terms of Clause 4.1 of Section II.

8.4 When making carbon-related statements, advertisers should provide clear and comprehensive information, including:

- 8.4.1 the calculation of total GHG emissions, substantiated by relevant qualifiers that specify the method, basis, and time frame used for any carbon-related claims, particularly for future commitments. Consistent time scales should be used for emissions, emissions reductions, and offsets;
- 8.4.2 the values used for translating GHG emissions into CO2 equivalents;
- 8.4.3 whether the reductions relate to CO2 emissions only or all GHGs (example carbon dioxide-CO2, methane- CH4, nitrous oxide-N2O), and which portions of the product life cycle the claim applies to (product, component, package, service or business operations);
- 8.4.4 how GHG emissions have been reduced or prevented internally; including a plan for reducing emissions verified by an accredited, recognised independent body, detailing both current and future expected emissions;
- 8.4.5 the offsets purchased to offset the residual emissions. Carbon offset claims should provide clear information about which portion or element of the product's life cycle is being offset and how it is being offset, ensuring transparency regarding the offset scheme. If the claim only applies to one portion of the product, this must be disclosed.

8.5 To avoid misrepresentation that the carbon-related benefit has already occurred or will occur in the immediate future, advertising claims about future carbon neutrality or other carbon-related benefits should clearly state the expected time period for these benefits to be realised. If the reductions or offsets will not occur immediately and are not likely to be achieved for many years, this must be clearly disclosed, ensuring transparency regarding the time frame and method by which these goals will be achieved.

## **9. Renewable Energy**

Renewable energy is electricity derived from sources that are constantly replenished. Energy derived from fossil fuels such as petroleum or coal are not renewable sources. Wind, solar

and geothermal energy are examples, but other sources, such as biomass or hydroelectric, may also be deemed renewable.

- 9.1 No advertiser may make claims that a product was manufactured or a service provided using renewable energy unless 100% of the energy used to produce the product or offer the service can be traced back to renewable sources. If this is not the case, appropriate qualifiers must be used.
- 9.2 Claims that electricity is derived or generated from renewable energy sources can be substantiated through contracts with electrical utilities, renewable energy certificates (RECs), or similar mechanisms that prevent “double counting.”
- 9.3 The advertiser must specify the type of renewable energy used (e.g., photovoltaic, wind, water, biomass, geothermal energy, etc.). If only a portion of the energy supply comes from renewable sources, the percentage of renewable energy used to power the manufacturing process to in making the product or package must be clearly and prominently specified. For example “Only 50% of the energy used in production is from renewable sources”).