### **G-Regs**<sup>™</sup>

### UK - Best Practice Environmental Claims - Cars



#### Full title:

Best Practice Principles for environmental claims in automotive marketing to consumers (Jointly endorsed by LowCVP, SMMT and ISBA)

Version: 01

### Title of relevant sections:

### **The Best Practice Principles**

- 1. General principles and definitions
- 2. Environmental Principles
- 3. Accessibility of information and plain language
- 4. Comparisons and comparability information

### **Imagery and Symbols**

## 1. General Principles and definitions

- a) Marketing communications should be legal, decent, honest and truthful.
- b) The same good standards of commercial practices should apply throughout the marketing chain.
- c) Consumers should be able to access information to make informed purchases with ease.
- d) An environmental claim means information appearing in marketing communications that can be taken as saying something about its environmental aspects.<sup>1</sup>
- e) A marketing communication includes advertising as well as other techniques, such as promotions, sponsorships, and direct marketing, and should be interpreted broadly to mean any form of communication produced directly by or on behalf of marketers intended primarily to promote products or to influence consumer behaviour.<sup>2</sup>

## 2. Environmental Principles

Environmental claims should:

- a) Be specific.
- b) Not mislead.
- c) Be capable of substantiation.

URL of source: http://www.lowcvp.org.uk/resource-library/reports-and-studies.htm

<sup>&</sup>lt;sup>1</sup> Defra Green Claims Code

<sup>&</sup>lt;sup>2</sup> Consolidated ICC Code of Advertising and Marketing Communication Practice.

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- d) Be transparent, unambiguous and clearly expressed.
- e) Follow a common sense approach.

# 3. Accessibility of information and plain language

- a) Consumer information should be easily accessible. For instance, where vehicle manufacturers provide CO2 emissions or fuel consumption information on their websites, they should ensure it is available within the minimum practical number of clicks.
- b) Plain language should be adopted and terms defined so consumers can understand technical data.
- c) It should be clear whether environmental claims apply to the vehicle, to particular components or technologies, to the vehicle manufacturer or phases of the life-cycle e.g. 'zero emission' claims should refer to 'whilst driving' or similar.
- d) Where environmental claims infer benefits that conform to the law or to industry standards, this must be stated.
- e) Environmental claims should not infer benefits that relate to aspects that would not normally be relevant to that vehicle/component/technology or corporate practice.
- f) Environmental claims should not imply that they are universally accepted if there is a significant division of informed or scientific opinion.
- g) All environmental claims should be reassessed regularly and withdrawn if they are no longer capable of substantiation.

# 4. Comparisons and comparability information

- a) Data quoted in comparisons should be clearly defined and adhere to commonly-adopted current industry standards. The following are examples of commonly used measures, but are not an exhaustive list of the units used: carbon dioxide (CO2) is usually measured in grammes/km; fuel economy in litres/100 km or miles per gallon; and regulated emissions referenced to Euro standards<sup>3</sup>, e.g. Euro 6.
- b) If only one drive cycle is quoted for fuel economy or CO2 performance in advertising headlines, the combined cycle data should be used in preference to urban or extra-urban cycle data. For plug-in hybrid vehicles, the equivalent drive cycle is the weighted combined cycle. It should be clear the weighted combined performance data relies upon both fuel and electricity e.g. MPG and miles/kWh (kilowatt hours), and that the electricity is mains sourced.

Euro 6 becomes mandatory for the first vehicle types from September 2014.

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<sup>&</sup>lt;sup>3</sup> European emission standards (Euro standards) set limits for exhaust emissions from new vehicles sold in EU member states. Emissions regulated include:nitrogen oxides (NOx), total hydrocarbon (THC), non-methane hydrocarbons (NMHC), carbon monoxide (CO) and particulate matter (PM). Compliance is based on a standardized test-cycle. New cars and vans must already comply with Euro 5. For more information visit: http://ec.europa.eu/enterprise/sectors/automotive/environment/euro5/index en.htm

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- c) Comparisons must compare like with like and make it clear whether they relate to a model range, specific vehicle or attribute.
- d) When referring to regulated emissions in comparisons, the Euro standard for all vehicles compared should be stated. Test data for regulated emissions should not be used inappropriately.
- e) When using MPG figures to make efficiency claims, it should be ensured that they are sufficiently explained, for example by stating 'MPG figures are official EU test figures for comparative purposes and real driving results may vary' or similar.
- f) Electric-only range figures should be sufficiently explained, for example by stating 'range figures are official EU test figures for comparative purposes and real driving results may vary', or similar.

### **Imagery and Symbols**

#### a) Use of "green" imagery

The use of 'green' imagery, such as featuring trees, vegetation or the colour green, should convey a level of environmental performance that is proportionate to the wording of the environmental claim and should be used with great care.

### b) Use of "green" symbols and endorsements

Third party endorsements, 'green' logos and kite marks must be depicted clearly; must only be used with the consent of the relevant third party and in such manner that does not mislead.

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