



Guide No 2

Communication of Sustainability Information (Claims)

What are sustainability claims?

There is a difference between a general claim and a sustainability claim.

General Claims are all statements, symbols, information, logos, graphics, labels, slogans, and product brand names that companies use in connection with their materials, products and activities intended to promote products or to influence consumer behaviour. Claims can appear on a product or service label, its packaging, in related advertising material, in promotional and point-of-sales material, and other forms of marketing.

Sustainability Claims are claims which suggest that a product is made, a service is delivered, or an organisation is run in accordance with defined principles of sustainability, sustainable production or sustainable consumption. This could include, among others, claims relating to the environment and climate change, biodiversity, animal welfare, deforestation, workers' human rights, corporate social responsibility, or ethical business practice.

The Sustainable Leather Foundation wants to support companies to develop sustainability claims and this document provides information and a checklist that represent a tool for companies who are ready to disclose clear, reliable and verifiable data on the benefits and impacts of their materials and products.

Legal Developments

On 22 March 2023, the European Commission adopted a proposal for a **Directive on Green Claims**. The proposal requires companies to substantiate any claims they wish to make about the environmental aspects or performance of their products and organisations, using robust, science based and verifiable methods.

In parallel, the regulatory framework at the national level is progressing. To cite a few examples, France recently adopted a **Circular Economy and Prevention of Waste Law** and a **Climate and Resilience Law,**' which include provisions on how to communicate and promote sustainability and prohibit the use of claims such as "sustainable and environmentally friendly."

The UK Competition and Markets Authority has also issued new guidelines on environmental claims through the **Green Claims Code** and reportedly increased enforcement activity.

In Germany, consumer associations are increasingly taking legal action against sustainability advertising, with subsequent decisions by the courts.

Sustainable Leather Foundation's Checklist for the reliability of claims.

- Clearly indicate if the claim applies to the product, the packaging, or both, or to process, components or materials.
- Develop specific claims that are not ambiguous.
- Ensure that the claim is clear and understandable for the target audience.
- Specify if the claim's benefit is likely to be realised when the product, component or package is manufactured, used, or disposed of. (Indicate which stages of a product's life cycle the claim refers to).
- Present the claim in an accurate, honest, and truthful manner.
- Take into account the product's nature.
- Show the direct link between the environmental benefits and impacts of the product and the related claim.
- Refer to the context to which the claim applies or clearly present this context.
- Comply with applicable laws or regulations in product advertising and marketing.
- Go beyond what is already prescribed by the law.
- Base your claims on robust, independent, verifiable, and generally recognised evidence which takes into account the latest scientific findings and methods.
- Make available appropriate and adequate test methods or scientific data supporting the claim.
- Use verification procedures and audits to substantiate the claims.
- Conduct verification on the actual product (or one that is substantially identical) to assure that the results are applicable to the advertised product for which the claim is made.
- Verify, before publication, that environmental data and information supporting the claim are in compliance with the reference standard.
- Conform to the principle of fair competition.
- In case the claim refers to the reduction of components or elements having an environmental impact, make clear what has been reduced.
- Clearly state the limits of the claim.
- Make available to customers and authorities the documentation that substantiates the claim, including any information about the product specific claims and any traceability system that supports the claim.
- Allow consumers to understand the evidence behind the claim.
- Include qualification or explanations in proximity to the claim being qualified to ensure that they are read together and clear to customers.
- Make sure that a visual claim is not confusing.
- In case of comparative claims, use agreed calculation methodologies that facilitate comparability.
- Analyse the trade-offs resulting from the attribute that proves the claim, if the claim conveys that a product has an overall environmental benefit because of a specific attribute.
- Avoid technical barriers for the consumers and make the claim accessible and visible for them (front of pack, appropriate font size, graphics/logo).
- Review the claim regularly to provide up to date information to consumers.
- Promote consumer education and awareness on the meaning and proper interpretation of claims.

The Sustainable Leather Foundation's approach to developing reliable claims can be summarised in two main principles:

Sustainability claims must be:

- ◇ **truthful and not misleading**
- ◇ **supported by data that substantiates their reliability.**

Through the development of credible claims it is possible to provide clear and accurate data to consumers, secure value chains and demonstrate commitment to sustainability. Trustworthy and engaging sustainability communication is key to driving more sustainable consumer behaviour and operational change within businesses. Click the QR code for our more detailed Pathway Paper on Communication of Sustainability Information.



Sustainable Leather Foundation

The Sustainable Leather Foundation's vision is to enable collective improvement and education globally, for more sustainable practices in leather manufacture and production. SLF is concerned with all aspects of sustainability – Environmental, Social and Governance. As a not-for-profit organisation, SLF provides a transparent and inclusive approach to demonstrating sustainable good practice throughout the value chain.

Coupled with this, SLF is committed to ensuring that consumers have a clear mechanism to see and understand the sustainable attributes of leather as a material, and the work that the industry does to ensure good practice. Our **Transparency Dashboard™** is the keystone of SLF's vision and is the only one of its kind in the leather industry. The Dashboard is what enables us to realise our "A.I.M. Approach" – Accessible, Inclusive and Modular for the benefit of all stakeholders. You can find out more about the work of SLF here:

www.sustainableleatherfoundation.com