

CIPR BEST PRACTICE GUIDELINES FOR ENVIRONMENTAL SUSTAINABILITY COMMUNICATIONS

- 1. An introduction to the guidelines**
 - 2. Greenwash**
 - 2a. Causes of Greenwash**
 - 3. Legal control of false and misleading claims**
 - 4. Proof points – backing up claims, advice**
 - 5. Rules of engagement**
 - 5a. Acid testing stories**
 - 5b. Practical tips**
 - 6. The Future**
 - 7. References**
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1. An introduction to the guidelines

Recent years have seen an increase in businesses and organisations focusing on the long term sustainability¹ of their activities - looking at all elements to improve the business process, becoming more sustainable in terms of environmental, economic and social performance. This has been heightened by the broad consensus that climate change is the greatest environmental challenge faced in the world today. Many scientists believe this is causing a rise in global temperatures, which in turn is bringing changes in weather patterns, rising sea levels and increased frequency and intensity of extreme weather. As is well documented, the balance of scientific opinion is that these effects will be far reaching both here in the UK and internationally, potentially causing severe problems for organisations and people in regions that are particularly vulnerable to change.

As a result, there is a demand from stakeholders for more information and proof of sustainability, particularly with regards to the environment. There is therefore a focus on businesses, NGOs, government and individuals to recognise their roles in reducing the environmental impacts of their activities. An increasing level of communications around sustainability is taking place as organisations communicate to their stakeholders the improvements, challenges, increases, or reductions, with regards to their business impacts. This has led to an explosion in 'green claims'.

The CIPR define a 'claim' as information appearing on a product, its packaging, or in related literature or media material, which can be taken as saying something about the environmental aspects of a company / organisation or product or service. It can take the form of text, symbols, or graphics². Public relations practitioners, especially those who are members of CIPR, have a particular duty in this area - and indeed, an opportunity, to set standards for responsible communications.

¹ Sustainability is characterised as a process or state that can be maintained at a certain level indefinitely. Sustainability focuses on providing the best outcomes for both the human and natural environments now, and into the indefinite future.

² Defra: Green Claims Code. What is a green claim?

These best practice guidelines are designed as a point of reference for those practitioners that are undertaking communications around this area not just in the corporate world but in government, NGOs and pressure groups. Whilst these guidelines do not constitute a legal document, all CIPR members are bound by the Code of Conduct which is based around three principles: Integrity, Competence, and Confidentiality. The Code of Conduct should be adhered to when engaging in any public relations practice and there are elements within the Code's principles, which are specifically relevant to any member giving consideration to sustainability communications.

Integrity: Integrity is key to ethical sustainability communications. It requires that members are honest and open in the activities they undertake in this area.

Members should have regard for the public interest. They should be accurate when disseminating information. They should never knowingly mislead clients, employees, employers, colleagues or fellow professionals. The issue of authorship is relevant here, and is touched on further in this document in terms of being responsible for what communication you send out, for example checking facts and claims made.

Competence: Members should, in this area, as in others, be aware of the limitations of their professional competence, and should therefore be willing to only accept work for which they are suitably skilled and experienced. They should ensure that the services they provide are costed and accounted for, in a manner that conforms to accepted business practice and ethics.

Members that undertake sustainability communications should do so in a way that is transparent, and they must make extra effort to disclose any potential conflicts of interest to the clients or parties for which they are working.

The drafting of material by public relations professionals for their clients naturally has a role to play in many areas of professional endeavour. But all messages, statistics, and / or claims made in communications should be supported by proof, or a robust and reasonable rationale for the claim (see Section 4. Proof points).

Confidentiality: Confidential information should not be disclosed unless specific permission has been granted by the parties concerned; or unless it is in the public interest; or unless required to do so by law.

Members should bear in mind that failure to adhere to the CIPR Code of Conduct could lead to disciplinary action, with sanctions up to, and including, expulsion from the CIPR.

The comments above are intended only as an outline of some of the issues raised by the three Code principles, they do not in any way supercede the full text of the Code. This document is intended as a statement of best practice – not as an addition to the Code.

2. Greenwash

Greenwash (a portmanteau of *green* and *whitewash*) is a term that is used to describe the actions of a company, government, or other organisation, which promotes positive environmental practices, whilst acting in a way that is opposite or does not adhere to the claim. It highlights a disconnect between aspiration and real world impacts.

It is a term often used when describing environmental sustainability communications that are false or misleading, generally when significantly more money or time has been spent *promoting being green*, rather than spending resources on environmentally sound practices. This can be portrayed by changing the name, or label, of a product, to give the 'feeling of nature', for example putting an image of a forest on a bottle of harmful chemicals. It is also sometimes used to distract from negative practices in other parts of a company's business.

Greenwash can lead to a reduction in stakeholders' trust, damaging reputation and investor confidence. Making false or over-the-top claims only strengthens media suspicions about eco-claims, which in turn damages efforts to improve the environment. PR practitioners should never knowingly greenwash and should take responsibility to question client claims if they believe them to be untrue or inaccurate.

Greenwash can be avoided through a process of strict governance, in terms of setting targets and robust reporting procedures, and by consultants following these best practice guidelines.

2a. Causes of Greenwash

To better understand Greenwash we should look at some of the causes³:

Selling products: In an increasingly competitive retail marketplace, differentiating products can be difficult. Many organisations look to do this through environmental attributes - and the temptation can be to exaggerate an attribute.

Culture: The business culture of some organisations has a large role to play in some acts of greenwash. People are proud of what they do and this can lead them to be reluctant to include mistakes, or challenges they face, in some CSR reporting (as opposed to formal sustainability reporting⁴), or communication. Greenwash is more likely to occur if the culture of the organisation does not place a high value on honesty, transparency and trust. This is particularly true of small acts of greenwash that may slip through any company checks and balances. Also, a business that has a 'compliance culture' on other regulatory issues is just as likely to take the legal compliance approach to greenwash. This kind of culture can lead to legal approval being the only point at which issues of misleading claims are considered.

Aspirations as actions: Aspirations and intentions are important to organisations, they show direction and leadership. However, this can become a motivator to greenwash, as the organisation looks to fulfil those aspirations, either by blurring the distinction between an aspiration and implementation, or by exaggerating the degree to which the aspiration has been met.

Enthusiastic but uninformed: Sometimes misleading environmental and/or sustainability claims occur due to ignorance of the law and of community expectations and of environmental issues. An organisation may be taking sustainability seriously, but in their enthusiasm makes some mistakes. In the worst instance, this can result in an industry leader being accused of greenwash, despite a better sustainability record than competitors.

Enthusiasm to communicate: Occasionally in the enthusiasm to communicate organisations can jump the gun before all of the proof points are in place. It is

³ Reputation or Reality: A Discussion paper on Greenwash and Corporate Sustainability 2005 (Total Environment Centre)

⁴ Formal sustainability reporting has a high level of governance as opposed to some CSR reports issued by companies. Assurance standards for formal sustainability reporting include those produced by the International Audit and Assurance Standards Board (ISAE 3000) and AccountAbility (AA1000AS).

important that the messages are checked in terms of: benefits to stakeholders; proven environmental credentials, verified by an independent organisation (see 4. Proof Points, Using Industry Standards); and, the aim of the organisation.

⁵**Being vague or ambiguous:** For instance, by simply trying to give a good impression about general concern for the environment. Claims should always avoid the vague use of terms such as 'green', 'non-polluting' and so on. Likewise, they should avoid linking vague descriptions, such as 'friendly' or 'kind', with words like 'earth', 'nature', 'environment', 'eco' and 'ozone'. Equally, a 'claim' should not imply that it commands universal acceptance if there is actually some significant doubt or division of scientific opinion over the issue in question. A risk analysis should be undertaken before communicating if this is the case, this should inform the Q and A's, which should be developed for all sustainability communications. The communicator should attempt to obtain evidence of the claim's robustness via appropriate accreditation, such as ISO, EMAS or Acorn.

Reputation enhancer: Reputation, or brand, contributes greatly to an organisation's worth. Greenwash can be an attempt to enhance the value of a brand by making false, or inaccurate, social and environmental impact claims.

Reputational risks: This includes issues that may negatively impact on credibility:

- When an organisation has failed to adequately address the principal sustainability impact(s) of its activities, whilst claiming credit in other smaller impact areas.
- When an organisation has failed to look at the sustainability performance of its activities outside of its home country. An example would be where a company claims to have reduced its carbon footprint significantly in its activities in the UK but not in its activities in Asia.
- When an organisation has failed to respond or had ignored previously expressed concerns of stakeholders.

3. Legal control of false and misleading claims

There is no substantial legislation that deals with false or misleading environmental claims. However, there are several pieces of legislation that may be considered.

⁶The Trade Descriptions Act 1968, which is enforced by local authority trading standard officers, contains the main general criminal offences concerning the application or supply of 'false trade descriptions'. The Act applies to the various types of descriptions listed in the legislation, such as the composition or physical characteristics of a product - it can be used to enforce 'green claims'. The Company Act 2006 is also a point of reference with regard to company reporting.

The Fair Trading Act 1973 has certain legal powers to protect the consumer against various types of unfair business conduct, but in their present form they do not seem satisfactory for dealing with many types of spurious environmental claims. For example, the Government's Director General has power under section 34 of the Act to deal with persistent conduct that is detrimental to the consumer, but 'detrimental conduct' is defined as meaning conduct that is already contrary to civil or criminal law. The Director General has a legal duty under section 124 of the Act to encourage the production of voluntary codes of practice by trade associations, but has no power to directly enforce these, and compliance rests on self-regulation.

⁵ Defra: Green Claims Code. Green claims should not...

⁶ Hansard Archives Research: Select Committee on Environment, Transport and Regional Affairs. Control of False or Misleading 'Green' Claims.

Codes of practice have also been used extensively in advertising, where legislative backing provides specific powers to handle complaints made concerning misleading advertising. The Advertising Standards Authority has acted with regards to false and misleading green claims in the past.

The environmental management standard series ISO14000 help organisations work to minimise their operational impact on the environment. ISO 14001 and the European regulation EMAS can be used to support organisations promote their green credentials. Organisations certified to these standards can demonstrate to customers that the environmental data they provide about their activities, services and products has been checked by an independent third party and the information is both credible and reliable. ISO 14063 (Environmental Communications) offers guidance to an organisation on general principals, policy, strategy and activities relating to both internal and external environmental communications⁷. ISO 14021 deals with 'self-declared environmental claims'. The standard is very product specific, but many of the requirements can apply to other communications, such as reports and media information. If you are making environmental claims about a product, you are strongly recommended to check ISO 14021 for guidance⁸.

Claims about products are also dealt with in the Defra's Green Claims Code, which was updated in 2000, following the introduction of ISO 14021 and sets out the standards a consumer can expect about a product. More general claims about the nature of the business offering the product are covered in separate guidelines on 'non-advertising' claims, issued by the Department for Business, Enterprise and Regulatory Reform. Other sources that can be used for guidance include the Association of Chartered Certified Accountants (ACCA).

4. Proof points – backing up claims

In order to maintain the credibility of the PR industry and the client or organisation that you represent, we recommend that all statistics and claims made in communications are done so in conjunction with 'proof points'. Proof points are defined as 'a robust and reasonable explanation for the statistics, statements or claims used'. The following advice can help ensure that greenwash does not become an issue for your organisation.

Transparency: To help the media and consumer understand claims, particularly those that require scientific knowledge to understand or prove, communications should be as clear as possible. Be aware of the audience with whom you are communicating to. Scientific terminology may be used in suitable circumstances but should be used responsibly and should not be used to 'merely blind with science'.⁹ Ambiguity should be avoided at all costs.

Using industry standards: If you are making claims that involve statistics, for example, in regards to emissions or waste totals (improvements, reductions, increases), it is advised that these claims are based on industry leading standards and methodology, such as those produced by the UN, Defra, the Carbon Trust, WRAP or the trade body that represents the industry in which the organisation operates. Where possible these claims should be independently verified. If you are using a different standard to back up, or prove a claim, you should clearly state why this has been done, and the rationale for having done so. There may be a very solid explanation and this should be communicated clearly.

⁷ http://www.iso.org/iso/catalogue_detail?csnumber=34676

⁸ http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=23146

⁹ BACC Notes of Guidance. 18. Environmental Claims.

Making claims that are difficult to prove: If you are making claims that are difficult for media or stakeholders to check or prove, practitioners should ensure that robust reference points are provided, it is not good enough to provide a 'take our word for it' approach. If this can not be done then it is advised to not use the claim, find a standard that does prove the claim, or find a credible independent body to endorse your claim.

Be honest: Much environmental sustainability communications tend to only highlight the successes. Don't be afraid to talk about the challenges in other areas to provide context and that you recognise that this is a journey for your organisation and there is still much to do. A focus should be given to commitments to continuous improvement. It is also advised that you should recognise the news value of your communication and not try to exaggerate the story, in order to 'up your chances' of getting recognition.

Beyond legal compliance: A compliance-based approach to sustainability communication is a minimum standard. Do not dress this up as anything else. Legal compliance should be used to back up an approach that has been taken to exceed that level of compliance. An example of this is where some companies still claim that their products are CFC free, when CFCs have been banned for more than 20 years.

Know your media: Communications to media, such as press releases and invites to sustainability related events, should be targeted to the appropriate audience. It will save practitioners time and money, and increase the chances of success. Often the 'less is more' approach is the most appropriate route.

Using carbon neutral / carbon off-setting: Many consumers believe that being carbon neutral denotes good environmental practice, where as this could actually mean that a company has bought themselves a good reputation - drawing a green halo over their brand. Quoting being 'carbon neutral' needs to be used carefully, particularly with regards to carbon off-setting as part of the process. There is conflicting opinion on the measurable benefits of carbon off-setting, at the heart of this is two key questions.

The first surrounds how the carbon off-setting scheme is used. Is it in isolation of a robust environmental policy to reduce your impacts or is it in addition? Off-setting is a transitional mechanism and not a long-term solution. It is accepted in some quarters as being effective, but should only be used whilst other reductions in carbon and energy efficiency is being made, or whilst more innovative use of existing or new technology is developed.

The second is whether the particular scheme is 'additional'. This requires you to prove that the carbon off-set scheme would not have happened without the investment being made in it. If it would likely have happened regardless then it isn't truly an off-set scheme. International agreement and guidelines on off-set schemes is expected in 2008.

5. Rules of engagement

These guidelines, if adhered to, should help organisations be open and transparent in using sustainability messaging. Organisations and individuals who do not respect the points these guidelines cover can find themselves criticised publicly for attempting to utilise sustainability for PR purposes, which can hugely damage corporate and individual reputations. As part of the rules of engagement particular emphasis should be made to ensure that the communication is relevant to the stakeholder or media, and that it is accurate.

Remember that practitioners misleading stakeholders with false, exaggerated or misleading claims are fuelling a cynical media and public. This makes it harder for those working in the marketing and PR industry to gain appropriate recognition for genuine successes, improvement or innovations and is likely to hamper the fight against climate change.

5a. Acid testing stories

A good way for practitioners to test the value or credibility of a story or message is to speak to contacts in the media or industry experts and ask for their advice. In this way practitioners are working in partnership with stakeholders, in particular the media, to avoid greenwash. When doing this practitioners will need to be careful with regard to the confidentiality of their organisation or client. Consultants should particularly look at the tone of communication, as opposed to just content, which should already have been decided before media contact.

5b. Practical tips

The following practical tips will help you with sustainability communications:

1. Ask what the purpose of the communication is? Is it just for PR sake? If so, question the story. Does it stack up?
2. Be transparent. Keep the messaging simple and clear, do not use ambiguous language or blur with scientific speak.
3. Be honest and don't exaggerate. This will instil a level of trust with stakeholders, particularly the media.
4. Back up all your claims with robust statistics that where possible are verified by independent industry leading standards.
5. Actions, not words. Do not blur the difference between an aspiration and an action.
6. Spokespeople. Some of the science is complex and any spokesperson needs to be suitably knowledgeable to communicate effectively and clearly the issues.
7. Message delivery. Ensure during the tactical implementation of the campaign that actions back up the messaging. Examples might include: a press junket to Bali that would undo even the most honest and transparent presentation of message; or a recycling campaign release that is sent hard copy on virgin paper.
8. Check your facts. Once you have done this, double check them.
9. Governance. Ensure strict governance is in place to communicate back to stakeholders on your story regularly.
10. Think continuous sustained improvement – be a leader! What is the next step for your organisation to improve further?

6. The future

This is a fast evolving area, there are regular new developments with an increasing number of legal regulatory and mandatory requirements that affect communications. Equally there may be changes in thinking or in science, for example with regards to off-setting, carbon capture or bio-fuels, as such the situation will be closely monitored. This will create new challenges for our profession. With this in mind, this is a living document which we intend to review and update regularly.

It is also going to be increasingly important for consultancies in particular to ensure that they look at their own sustainability strategy and position. It is important our industry practices what we preach in order to be sufficiently credible to undertake sustainability communications.

7. References

DEFRA: Green Claims Code

<http://www.defra.gov.uk/ENVIRONMENT/consumerprod/gcc/index.htm>

OFGEM: Guidelines on Green Supply Offerings

http://www.ofgem.gov.uk/Sustainability/Environmnt/Policy/Documents1/2183-31green_supply_offerings_guidelines.pdf

UNEP: Sustainability Communications

http://www.unep.fr/pc/sustain/advertising/events_specifics/Education%20Kit_EN.htm

WWF Report: Let Them Eat Cake

http://www.wwf.org.uk/news/n_0000002589.asp

EMAS

http://ec.europa.eu/environment/emas/index_en.htm

Guidance on Promoting and Marketing your environmental Credentials

<http://www.emas.org.uk/guidance/mainframe.htm>

ISO 14001

<http://www.bsi-global.com/en/Shop/Publication-Detail/?pid=000000000030062232>

ISO14021

http://www.iso.org/iso/iso_catalogue/catalogue_tc/catalogue_detail.htm?csnumber=23146

ISO14063

http://www.iso.org/iso/catalogue_detail?csnumber=34676

International Audit and Assurances Standards Board

<http://www.ifac.org/IAASB/>

Accountability

<http://www.accountability21.net/>

Association of Chartered Certified Accountants

<http://www.accaglobal.com/>

UN Global Compact

<http://www.unglobalcompact.org/>

Business Reviews under Companies Act 2006

<http://www.berr.gov.uk/bbf/co-act-2006/Major%20Benefits%20to%20Business/page35194.html>

For environmental/sustainability reports, companies should follow the UK government reporting guidelines:

<http://www.defra.gov.uk/environment/business/envrp/pdf/envkpi-guidelines.pdf>

Global Reporting Initiative G3 sustainability reporting guidelines:

<http://www.globalreporting.org/ReportingFramework/G3Guidelines/>