



**Consumer
Focus**
Campaigning for a fair deal

Green expectations

Consumers' understanding of green claims in advertising

Lucy Yates



About Consumer Focus

Consumer Focus is an executive non-Departmental Public Body of the Department for Business, Innovation and Skills (BIS), created by the Consumers Estate Agents and Redress Act 2007. The organisation's statutory name is the National Consumer Council.

Consumer Focus was formed through the merger of three organisations – energywatch, Postwatch and the National Consumer Council (including the Scottish and Welsh Consumer Councils). The organisation works for the interests of consumers across England, Wales, Scotland, and, for post, Northern Ireland, and has offices in London, Glasgow, Cardiff and Belfast.

Consumer Focus started operations on 1 October 2008, and works with and on behalf of consumers across England, Wales, Scotland, and, for post, Northern Ireland. Through campaigning, advocacy and research, Consumer Focus works for consumers in private and public sectors. Consumer Focus has a commitment to work on behalf of vulnerable consumers, including taking up energy and postal complaints on their behalf, and a statutory duty to work on issues of sustainable development.

www.consumerfocus.org.uk

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This report reproduces adverts, which appeared between 1 June and 30 November 2008, from Ariel, Bosch, BMW, Doktor Power, Easyjet, Lexus, Mitsubishi, Muller, National Express, Npower, Renault, Shell and Starbucks on pages 13 and 35-37. Our aim was not to find whether these adverts contained 'good' or 'bad' green claims, neither to praise nor criticise specific companies. Instead, it was to observe the reactions of consumers and better understand how they respond to specific elements of the green claim, for example language, third-party verification and comparisons.

The views expressed in the quotes are those of the focus group participants, not of Consumer Focus.

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'Well it's just a random figure [g CO₂/km]. Unless they compare it with something it's just a random figure'
Female, Cardiff

'You don't really know what to believe. There's a lot of conflicting evidence. You read things in one article and then something else says something else'
Female, Chichester

1 Executive summary



Two thirds of consumers tell us that they find it difficult to know which products are better for the environment and more than half of consumers (58 per cent) think that a lot of companies pretend to be green just to charge higher prices. This report shows that advertisers making green claims have a long way to go in helping consumers feel confident about making greener choices.

Companies are increasingly marketing the environmental credentials of their products to win the hearts of consumers keen to do their bit to save the planet. There have been a growing number of complaints to the advertising authorities over green claims, prompting concerns that some businesses are seeking to unfairly exploit the green pound in order to boost profit margins. Both the Advertising Standards Authority (ASA) and Defra have been concerned enough to launch reviews of their rules and guidance this year, in an attempt to clamp down on these abuses before a sceptical public start to distrust all green claims.

There is a fine line between scepticism and cynicism – without confidence in the truth of advertising, consumers could become reluctant to exercise their green purchasing power, as they no longer know who or what to believe. This can put the whole market for the ‘green pound’ in danger. Getting this right is clearly in businesses’ self-interest. When promoting green products or services, companies need to be careful about how their messages come across to consumers to avoid reducing trust in both the company itself and the wider green agenda. Any charge of ‘greenwashing’, whether true or not, is likely to be picked up by the media, investors and consumers, and is potentially damaging to a company’s credentials and consumer confidence.

Consumer Focus wants companies to develop greener products and to compete on their green credentials. But this should be fair competition and the authorities must remain active in clamping down on those who break the rules.

‘I think we went through a phase where it was all about your calories and fat and everything like that in your food and that’s quite well indicated now, but how recyclable a product is, or how environmentally friendly it is, that’s not clear’.

Male, Stirling

58%

More than half of consumers think that a lot of companies pretend to be green just to charge higher prices.

The 3Cs principle



We carried out research with consumers to find out their understanding of green claims in advertising, what appeals to them and what they distrust. Our findings offer insights into where existing green claims guidance can be strengthened. This report aims to inform the work of both those engaged in developing green claims in advertising and those charged with regulating such claims.

Our research shows that, in order for consumers to have confidence and trust in the green claims, companies need to follow the 3Cs:

Clarity – consumers are looking for, as a minimum, claims that are clear and easy to understand. There is demand for information on green issues that is direct and ‘to the point’. Ambiguous and overly technical terms are not widely understood or liked by consumers.

Credibility – consumers want realistic, accessible and verifiable claims. They deploy a series of ‘perceptual filters’ to make rapid judgements, based on intuitive and in-built rules of thumb. They can be grouped into four categories:

- **Ad specific elements:** There is widespread dislike of small text, asterisks and footnotes (all of which are considered to represent ‘the catch’), whereas third-party endorsements from well known and respected organisations are highly valued by consumers.
- **Perceptions of brand & brand ‘fit’ with the environment:** Consumers were more likely to accept and believe

claims that ‘made sense’ (ie, a brand with which they have positive associations and/or believe is consistent with environmental responsibility) but were more suspicious of other brands. This ‘brand baggage’ affected their assessment of the specific green claim.

■ **Ingrained habits and beliefs:**

Consumers draw upon their own experiences of green products to judge the credibility of a claim and – where they have no experience – expectations of performance are used as a proxy.

■ **The wider market and social**

context: Consumers have varying levels of confidence in how strictly green claims are regulated and this impacts on how credible they perceive claims to be.

Comparability – these emerge as one of consumers’ most important demands. Consumers want simple, meaningful and like-for-like comparisons. The absence of meaningful comparisons, the general proliferation of labelling schemes and comparisons that are not well understood (eg, grams of CO²/km on car ads) offer little

or even undermine the relevance and usefulness of a green claim. In addition, as the number of products and claims expands, the sheer amount of information may drown out the ability of consumers to make like-for-like comparisons and ceases to provide them with any useful means of differentiation.

Alongside these issues, it is key for companies to consider that sometimes it may not always be best to emphasise the greenness of a product above all else. During our research, the key factors of cost and performance also emerged. While not a prompted topic in the research, these were given as two of the main reasons that consumers weren’t buying more green products. It is imperative that products and services for which green claims are made achieve improved environmental standards as well as delivering on cost and performance. Misjudging the balance and overemphasising the former at the expense of the latter can mean that consumers can fail to respond to companies’ efforts.

‘Different stores have their own labels and there’s no consistency between them so it can be confusing’
Male, Chichester

‘The rule of thumb now is that small print is usually bad news’
Male, Chesterfield

140%

The increase from 2007-2008 in the number of adverts that the FSA upheld decisions against

Recommendations

- The revision in 2009 of the Government's Green Claims Code and the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP) codes, which cover environmental claims, should incorporate the 3Cs identified in this consumer research. Particular attention should be given to the issue of comparison, which is insufficiently dealt with in the current Codes. Comparison advice should cover relative and absolute comparisons, meaningful comparisons as well as standardisation and consolidation of standards.
- Government (Defra) should work closely with its stakeholders to develop and agree definitions, both in meaning and application, for widely used green claims. Industry must also play an active role in shaping the definitions and methodologies that govern different industry sectors to ensure that there is buy in from all relevant stakeholders. This will enable improved communication on the environmental performance of products and services.
- Government, consumer organisations and other relevant stakeholders should work with companies to help them develop consistent and consumer friendly ways of communicating technical green claims.

- The Advertising Standards Authority (ASA) needs to increase its profile on green claims among the public, publicising its enforcement role further, so consumers can have more confidence in the fact that the green claims companies make are truthful.
- Companies should, where relevant, provide meaningful comparisons for consumers. Consumers want to be able to compare claims made on different products but do not like comparisons that they can't understand, or the proliferation of different labelling schemes. These offer little or may even undermine the relevance and usefulness of a green claim. Better information, not necessarily more, should be a cornerstone of empowering pro-environmental consumer choices.
- When making green claims, companies must also consider other customer satisfaction factors of cost and performance.

'So if it's the best of the seven seaters, where does it rate overall? Way down'
Male, Chesterfield

'But then I don't know even how long other products take to biodegrade so for me there's no comparison at all. That doesn't tell me if it's any better than anything else'
Female, Chichester

2 Introduction



We know that many people want to do their bit for the environment. Despite consumers feeling the pinch in the current economic downturn, our research shows that interest in environmentally responsible products remains significant – more than half of consumers (54 per cent) say that they are buying more environmentally responsible products compared to two years ago, against just three per cent who say they are buying less. In addition, there is a growing market for ‘ethical’ products, with the average household spend in line with their ethical values going up 93 per cent from 2002 to 2007¹.

Despite this, we know that the sustainable or green choice is often more difficult, more expensive or harder to find. The solution to increasing the uptake of more sustainable lifestyle choices lies in making these choices easier for consumers and ensuring they are part of everyday life. And that is where business comes in; we want to see business being a positive catalyst for change.

Consumers are now confronted with an increasing number of green claims – some in relation to specific products or product ranges, others in relation to a company brand or even an industry sector as a whole. Green claims in advertising have the potential to play a part in encouraging consumers to make sustainable consumption choices, as well as rewarding progressive companies for their efforts. This can, in turn, encourage business to make further environmental innovations, completing a virtuous circle.

However, green claims also have the possibility, intentionally or otherwise, to mislead consumers and, in doing so, erode trust in the premise of environmentally responsible purchases. Alongside this, consumers can find green claims confusing – the complexity of information required to make a judgement on the greenness of a product can leave even the most dedicated green consumer confused and disempowered.

Market growth



The number of consumers buying more environmentally responsible products compared to two years ago¹

There is also a lot of ‘noise’ in the green claims market, with many different claims being made. At one level this is good news: first mover companies want to use their environmental performance as a point of differentiation, while competitors lagging behind will try to at least close the gap. However, there is a risk that companies need only engage partially with the agenda, leading not to a ‘race to the top’ (where genuine ‘first movers’ prosper and gain consumer recognition and, with it, market edge), but a ‘race to the average’.

¹ The Cooperative Bank. The Ethical Consumerism Report. 2008

And there are, of course, genuine complexities in determining what the sustainable or green option is. As the ASA notes, the *'lack of official definitions and the emerging science and technology in this area make it difficult to make assessments.'*

The ASA has recorded a growing number of complaints in recent years— in 2006 it received 184 complaints about environmental claims; by 2007 this had increased to 561 complaints. While it is encouraging that complaints have gone down in 2008 to 369, it is important to note that the number of adverts that had upheld decisions against them has gone up by 140 per cent². These rulings were mainly in the motoring, utilities and energy sectors³.

Despite these claims falling foul of the ASA rules, the majority of green claims being made in the market place have passed existing rules. It is encouraging to see that companies recognise the growing importance of the green agenda and are competing on these issues.

There is a growing interest in the policy community on the issue of green claims. The Government is involved on a couple of fronts. Firstly, Defra is planning a review and update of their Green Claims Code in 2009. The code was initially devised to assist businesses in advertising their green products and services with confidence, and help protect consumers from misleading or inaccurate claims. The code was last updated in 2003 but because of the growth in both the market for 'green' products and the amount of claims being made, the code

now needs revising to take into account the current marketplace. Secondly, the House of Commons Environmental Audit Committee has also recently published a report⁴ highlighting the importance of meaningful environmental claims and the damaging nature of greenwash, which will be followed up by government in 2009.

Alongside this, CAP and BCAP published, at the end of March 2009, a consultation on their Codes that regulate non-broadcast and broadcast advertisements respectively. This consultation, running to the middle of June 2009, will review all of the existing Codes, of which environmental claims are a part, to ensure that the new Codes are relevant and fit for purpose. Compliance with the CAP and BCAP Codes are mandatory and the ASA is responsible for administering the Codes, receiving and investigating any complaints received.

It is pleasing to see some co-ordination between these reviews, with a new principle to be included in the CAP and BCAP environmental claims Code, that 'marketers should take account of Government guidance including the Green Claims Code published by Defra'. This helps to ensure that any new Government guidance on emerging issues and definitions in the green claims area will be taken into account by the ASA when investigating complaints about environmental claims.

These reviews represent a key opportunity to make concrete changes that will make a difference to helping consumers make greener choices. This report intends to inform this work.

² Statistics provided by the ASA

³ ASA annual report 2008. http://www.asa.org.uk/NR/rdonlyres/00BD4E90-5A7E-4E33-BC14-9B0A843C4C69/0/ASA_CAP_annual_report_08.pdf

⁴ <http://www.publications.parliament.uk/pa/cm200809/cmselect/cmenvaud/243/24302.htm>

3 What we did



This report investigates consumers' understanding of green claims in advertising, offering insights into where new green claims guidance can be strengthened; to constructively inform those engaged in developing green claims in advertising, as well as those charged with regulating such claims.

Our research uses specific examples of advertising in order to reach this understanding. However, our aim was not to find whether these adverts contained 'good' or 'bad' green claims, neither to praise nor criticise specific companies. Instead, it was to observe the reactions of consumers and better understand how they respond to specific elements of the green claim, for example language, third-party verification and comparisons.

Green claims are defined by Defra as 'information appearing on a product, its packaging, or in related literature or advertising material, which can be taken as saying something about its environmental aspects. It can take the form of text, symbols, or graphics.'⁵ Our research widens this definition slightly to include some broader sustainability issues such as fair trade and organic. This is because the consumers in our research didn't separate out these issues, seeing green claims as covering wider sustainability issues, not solely environmental claims. The distinction between these issues, in consumers' minds, is arbitrary. Our findings are therefore relevant for both the green claims agenda but also for wider sustainability claims.

The research process involved three main phases:

1. Ad selection

This first stage involved the selection of specific ads carrying green claims. A search of Xtreme Information's library of ads – for the period 1 June – 30 November 2008 and according to a 69 key word search (Appendix 1) – elicited a total of 492 ads carrying green claims. From this list we selected 43 ads to use in the research, chosen to provide coverage of a range of ad formats (TV, print, radio, online) and industry sectors (transport, energy/energy utility, household goods – food, household goods – non-food, electronic goods and tourism).

We also brought together a small panel of experts⁶ to help us analyse the adverts in order to be aware of key issues and potential areas of discussion before the focus groups.

2. Focus groups

This strand of the research involved four large focus groups, each with 25 consumers (100 in total). Groups were conducted in Chichester, Cardiff, Chesterfield and Stirling from 24 February – 4 March 2009.

Recruitment was undertaken according to a questionnaire to include those who stated that they had an interest in environmental issues⁷. This was because the research sought to understand what would encourage consumers to make green purchases and to develop insights into where new green claims guidance can be strengthened.

⁶ Dan Crossley from Forum for the Future, Becky Willan from Clownfish and James Turner from the ASA

⁷ Excluding only those who said they don't do anything that is environmentally friendly and never look out for, think about or use the information that companies provide on environmental issues.

⁵ Defra. Green Claims Code. 1998

There was insufficient time to debate the validity of green claims as a concept. Views from a wider range of the population were gathered in the online survey (see below). The groups lasted two and a half hours. Each group of 25 consumers was divided into three mini groups, of around eight people. We also filmed the focus groups and have a short DVD of consumers' responses.

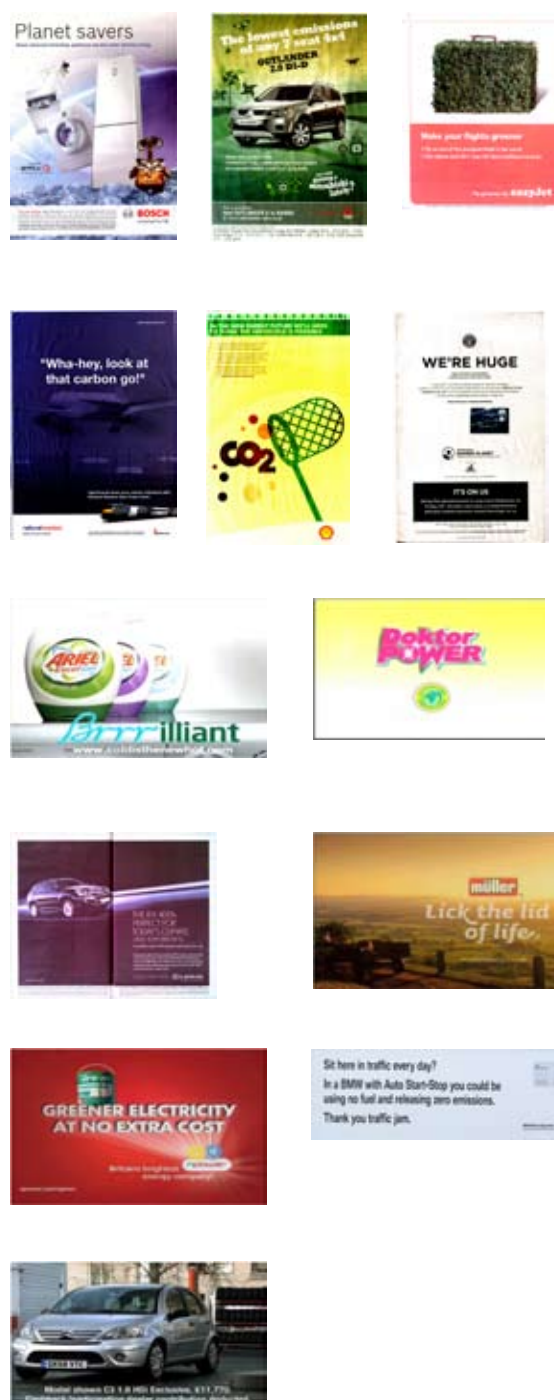
Of the 43 selected ads, 13 were categorised as 'core ads' (Figure 1) and were seen by all participants in every group. The remaining 30 ads (referred to as 'group specific' ads – see Appendix 2) were seen in some mini groups but not others.

3. Online survey

Following on from the focus groups, an online quantitative survey was undertaken. This involved a representative sample of 1,040 adults aged 18 to 65 in Great Britain, in March 2009 (see Appendix 3).

The questionnaire was 15 minutes in length and incorporated 11 of the core ads. These were shown or played on screen as participants completed the survey. This was an excellent way of getting the views of a large number of consumers immediately after they viewed each advert on screen. As far as we know, an online, statistically significant representative interactive survey on this scale has not been attempted before on this topic.

Fig 1: The Core Ads



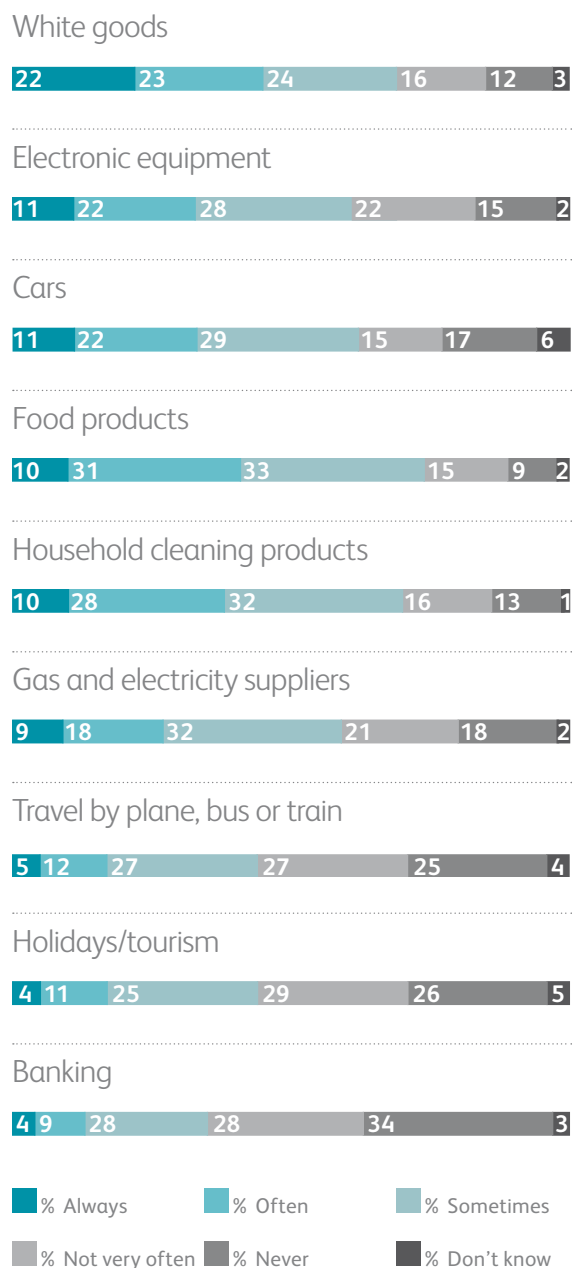
4 Consumer demand for green



Consumer demand for environmentally responsible products is on an upward trajectory and one that appears relatively resistant to the economic downturn. More than half of consumers (54 per cent) say that they are buying more environmentally responsible products compared to two years ago, against just three per cent who say they are buying less. Close to two in five (38 per cent) say they are buying about the same. Looking at the types of consumer making more green purchases than two years ago, we can see that consumers from across all social grades are engaging in these behaviours. For example, in group AB, 60 per cent claim they are buying more than two years ago compared to 54 per cent C2 and 49 per cent of DE consumers. Such variations are relatively minor and show that green purchase behaviour is evident across all consumer groups.

However, not all consumers are looking for environmental information when they shop. More than a third of consumers 'always' or 'often' look out for green product information but 29 per cent say they 'never' or 'not very often' look for this information. However, it is important to remember that better information, rather than more, is the key to helping consumers make more sustainable choices.

Fig 2: For which products is green information sought?



Source: Our online survey


Fig 3: Defra's seven segmentation model

- 1 'Positive greens'**
18% of the population (7.6 million)

- 2 'Waste watchers'**
12% of the population (5.1 million)

- 3 'Concerned consumers'**
14% of the population (5.7 million)

- 4 'Sideline supporters'**
14% of the population (5.6 million)

- 5 'Cautious participants'**
14% of the population (5.6 million)

- 6 'Stalled starters'**
10% of the population (4.1 million)

- 7 'Honestly disengaged'**
18% of the population (7.4 million)

'Are they actually doing it behind the scenes? I think a lot of companies are trying to do stuff, or say that they're trying to do stuff. But are they actually doing it?'
Female, Stirling

It is interesting to note that the demand for information on environmental performance varies significantly across different product types and different consumer groups. It is strongest in relation to food, white goods and household cleaning products – 74 per cent, 73 per cent and 67 per cent of consumers classified as highly environmentally receptive say they 'always' or 'often' look out for information on environmental performance in relation to these product areas. However, even in the high environmental receptivity groups, only 49 per cent 'always' or 'often' look out for information on gas and electricity suppliers and only 34 per cent for travel by plane, bus or train.

When thinking about these findings, it is worth noting, that consumers can't be straightforwardly bracketed as either green or non-green. Defra's environmental segmentation model⁸ divides the public into seven clusters, such as 'positive greens', 'sideline supporters' and cautious participants. Each segment has a distinct set of attitudes and beliefs towards the environment, environmental issues and behaviours. Clearly, different groups of consumers are motivated in different ways and will need to be communicated to differently. However, our research develops some overarching principles that can help companies understand what helps consumers make greener choices.

⁸ <http://www.defra.gov.uk/evidence/social/behaviour/pdf/behaviours-jan08-report.pdf>

5 Consumers' reactions to green claims



64%

of consumers find it difficult to know which products are better for the environment

This section of the report explores consumers' general reactions to green claims in advertising. The research demonstrates uncertainty and scepticism among many consumers towards green claims, but this does not appear to have translated into consumer fatigue or cynicism. Indeed, the majority of consumers want to see companies do more to promote environmentally responsible options and likewise there is support for the removal of environmentally irresponsible options via choice editing.

The survey shows that consumers are both uncertain and sceptical of green claims. Two thirds (64 per cent) of consumers tell us they find it difficult to know which products are better for the environment. These findings were the same across all groups of consumers – those who are less environmentally receptive and those who are more.

Furthermore, more than half of consumers (58 per cent) thought that a lot of companies pretend to be green just to charge higher prices. This scepticism was higher among greener consumers. However, it is evident that this had not yet turned into outright cynicism. The greener consumers in our research gave adverts shown in the online survey better marks on issues such as trust and believability than less environmentally receptive consumers. This shows, despite scepticism in some areas, there is still a real willingness to engage with the green agenda.

Similar reflections were evident in the focus groups, with participants naturally sceptical of claims and trying to see through the 'sales pitch':

'You don't really know what to believe. There's a lot of conflicting evidence. You read things in one article and then something else says something else'
Female, Chichester

'Are they actually doing it behind the scenes? I think a lot of companies are trying to do stuff, or say that they're trying to do stuff. But are they actually doing it?'
Female, Stirling

In relation to the wider regulatory framework within which ads operate, consumers appear uncertain as to whether or not it is illegal for a company to advertise a spurious claim. Only around one in five (22 per cent) are confident enough to say that it isn't possible for companies to make false claims about environmental performance.

In the focus groups, many participants assumed (or just hoped) that claims made in ads must be subject to some form of vetting by a standards agency, although few were confident that spurious claims would necessarily be picked up:

'I think you kind of just have to believe in it. You just think there are regulations in place and they can't hopefully go too far from the truth'
Female, Chichester

'Can they put that at the bottom of an ad, legally? They can't put something like that if it's not true? Surely someone [looks at it], like trading standards?'
Female, Chichester

'They have to be out there first, someone has to complain. And then the Advertising Standards Agency will do something about it'
Male, Cardiff

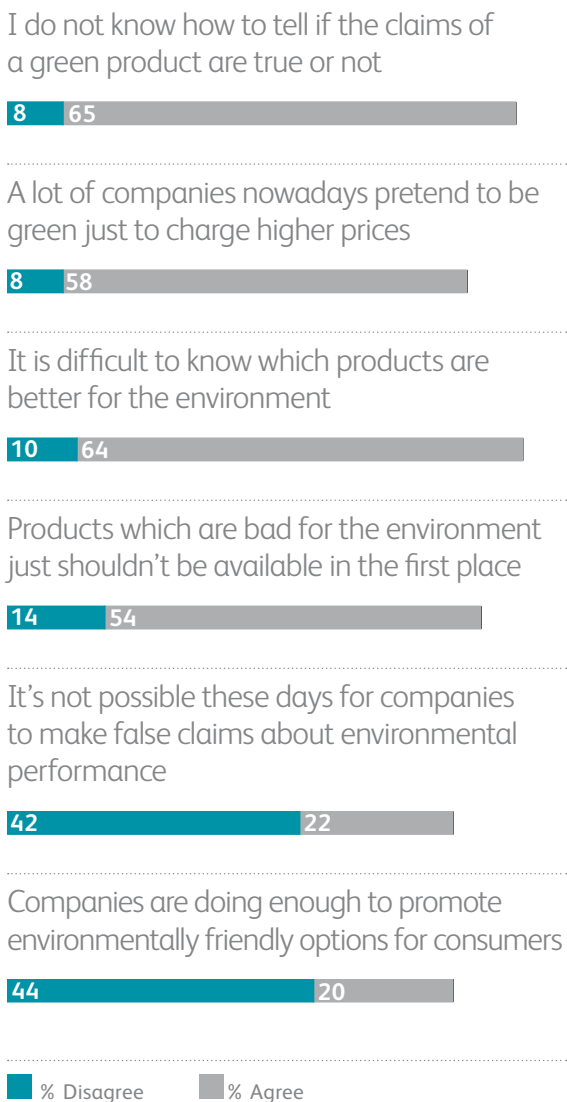
20%

Only 20% of consumers believe companies are doing enough to promote environmental friendly options

'It doesn't make sense – 'the first to go carbon neutral across its business operations'. What exactly is that?'
Female, Chichester

Fig 4: General attitudes to green claims

To what extent do you agree or disagree with the following statements?



Source: Our online survey

It is clear from our research that the regulation of green claims does not carry the confidence of consumers and needs to be strengthened and made more visible.

This may require greater enforcement by the ASA in order to bring the arrangements in line with consumer expectations, enabling consumers to more readily trust claims when they see them.

Even though consumers are uncertain and sceptical about green claims, they still want companies to do more to promote environmentally responsible options – only one in five (20 per cent) believe companies are doing enough. And, in addition to promoting more environmentally responsible options, there is strong backing among consumers, in principle, for the removal of environmentally irresponsible options via choice editing – improving the environmental standards of all products and removing the most damaging products from the shelves. More than half (54 per cent) told us that products which are bad for the environment just shouldn't be available in the first place. This is consistent with previous research^{9 10}, which also showed consumers' enthusiasm for the concept of choice editing.

⁹Eco-promising: communicating the environmental credentials of your products and services, Forum for the Future (2008)

¹⁰Bad Habits & Hard Choices: In search of Sustainable Lifestyles, Brook Lyndhurst (2004)

6 How do consumers respond to green claims?



This section of the report looks at what consumers want from green claims, exploring their principles of what makes an effective and trusted green claim. Three key issues emerge: clarity, credibility and comparisons – the 3Cs.

With 65 per cent of consumers telling us that they don't know how to tell if the claims companies make are true or not, there is a lot more that companies can do to help consumers make greener choices.

Clarity

Consumers are looking for, as a minimum, claims that are clear and easy to understand. Participants in the focus groups pointed to a number of facets of language that made a claim more or less easy to understand, including:

■ The overall amount of information

– for most consumers less is evidently more, and there was a demand for information on green issues that is direct and to the point:

'It needs to be a brief, clear, concise message. I don't want to read a paragraph, it needs to be simple'

Female, Chichester

'You must be really bored to read something like that, you must be waiting for a bus'

Male, Cardiff

■ **The terminology used** – While some of the greener consumers were comfortable with phrases like 'carbon offset' and 'carbon capture and storage', this was not true of all and certainly not of those with mid and low green receptivity. Most of the consumers struggled to understand what was meant by these terms. People wanted

simple terms to be used so there was no potential for confusion and misunderstanding:

'It doesn't make sense – 'the first to go carbon neutral across its business operations'. What exactly is that?'

Female, Chichester

'They're trying to baffle you here with big words and clever stuff'

Male, Cardiff

■ **Use of ambiguous words** – there were several terms used in the ads that were perceived to be ambiguous and therefore disliked:

'Where it says 'we are working to keep', what does that mean? That's not a promise that they're going to do anything particularly'

Female, Chesterfield

'We plan to'...'potentially'. It's all 'ifs' and 'buts'. This is not 'we've written a contract and we will do this', it's 'potentially if we work with these partners then we might do this'

Female, Chichester

There was understanding that these words could be beneficial in some circumstances. Although they could allow a company to communicate what they are doing but at the same time recognise the uncertainty of the outcomes, it was largely felt that these ambiguous terms were 'greenwash'.

Companies need to be careful about how these messages come across to consumers to avoid reducing trust in both the company itself and the wider green agenda. Any charge of 'greenwashing', whether true or not, is likely to be picked up by the media, investors and consumers, and is potentially

damaging to a company's credentials. These allegations of 'greenwash' can also provide confused or reluctant customers with an excuse to do nothing.

■ **Use of imagery** – some participants relied on imagery to provide them with clarity of understanding, either by providing a supporting story line or an interesting hook into the advert. However, imagery that is unclear or not obviously connected to the product did confuse participants from all groups. This was particularly evident in relation to an internet advert regarding a 'green' laptop, which used images of wind turbines to reinforce the green association, and an Npower ad (used as a core ad) which used the imagery of pouring green paint around radiators in a home.

'You can relate, because you create a picture and there's more of a story behind it'
Female, Cardiff

'Is the claim just a longer battery life, it's not a claim that it runs on wind energy?'
Female, Chichester
(referring to an online laptop ad)

'That one with green paint is my favourite, that one for the cleaning fluid'
Male, Chesterfield (referring to Npower ad)

'I mean it's stating g CO² but unless you've looked into what's good and what's bad, you just see the number you don't know where on the scale that is'

Female, Chichester

'It's just clever. They've made you think of greenery. As eco friendly as it can be.'

Female, Chichester



'My first impression, and I hadn't even read it, it looks like a four wheel drive so how can it be environmentally friendly when you can buy a smaller car? So, I wouldn't even read that.'

Female, Chichester

'It's still probably one of the highest emissions of 90% of other vehicles'
Male, Cardiff

'So if it's the best of the seven seaters, where does it rate overall? Way down.'
Male, Chesterfield

Comments are colour coded to reflect which of the 3Cs they best represent:

● Brown = clarity ● Blue = credibility ● Green = comparisons

Credibility

Credibility is a key demand from consumers. However, the issue of what makes a claim 'credible' is broader, complex and, at times, more nebulous than is the case with clarity.

In the focus group discussions, it was evident that people were making a number of mental short cuts to determine whether or not a claim was credible. Many of these were intuitive judgements based on automatic 'rules of thumb'. This should not be surprising – rarely will consumers have the time or inclination, outside of the research setting, to consider an advert in extensive detail. Reactions are driven by spontaneous and often subconscious factors and in the research we were as interested in these immediate reactions as we were the detailed discussions that followed.

The use of short cuts is well documented in the psychological/behavioural economics literature¹¹. What is of interest to us here is which short cuts are operating specifically in relation to green claims and how these influence consumer judgements. The research demonstrated four main categories: one in relation to the ad itself, and three others that – together – set the context within which consumers assess an ad: perceptions of the brand, personal experiences and aspirations, and the wider market and social context. These are discussed below.

¹¹ Daniel Kahneman won the Nobel Prize in Economics in 2002 for demonstrating that the human brain has two principal systems of thought - System One (Feeling) and System Two (Reason). System One is typically used to make initial, rapid and often unconscious judgements, which are then (slowly) backed up or dismissed by System Two.

1. Ad-specific factors

There is a cluster of factors that relates to the constituent elements of an ad, several of which emerge as key determinants of the credibility of a green claim. For example, the use of third party endorsements is a case in point, affording consumers confidence and an additional layer of vetting. Indeed, endorsements from well-known and respected organisations were positively received (eg, Fairtrade or What Car?). We know from previous research¹² that consumers want independent verification of the green claims made by businesses about their products. Seventy per cent of consumers in the US and UK said that climate change claims should be proven by independent parties¹³. In our survey, 58 per cent of consumers thought an advert endorsed by an environmental organisation was something that would make them confident in a green claim made by a company.

'If that had the Fairtrade logo on it I think it would sell a bit more' Male, Cardiff

'The fact that it's won that award is good. What Car? is credible' Male, Cardiff

However, where third parties were not well known (eg, Conservation International in the Starbucks core ad) participants treated them with a greater degree of suspicion. Given the generally low levels of consumer trust in big business¹⁴, some degree of external verification is a key component of any credible environmental claim. In choosing which organisation to use, companies need to consider brand fit, benefits to suppliers and where the best opportunities lie for engaging with customers.

¹² What Assures Consumers on Climate Change. Consumers International and AccountAbility, 2007.

¹³ Ibid

Consumers also tried to identify third parties with an apparent vested interest – some, for example, took issue with Co-op’s awards from The Grocer magazine on the grounds that it was an industry award scheme. The question of Government third party endorsement also provided mixed responses – some participants would be reassured by this, whereas others indicated that they would prefer alternatives.

‘It’s (Conservation International) probably a subsidiary of Starbucks¹⁵’ Male, Cardiff

‘If it was government approved that would re-assure everyone’

‘An independent body maybe. Not government, I’d prefer independent, some companies have a background in this, like the Body Shop’

‘Greenpeace or something like that. I don’t trust the government’ Exchange in Stirling

In contrast, the use of asterisks and footnotes in small text was regularly singled out by participants as a negative element of a claim, representing – to many – ‘the catch’:

‘When they do those little asterisks, I hate those. ‘Cos you’re like there’s always something hidden, and it’s always in even smaller text.’ Female, Chichester

‘Basically an asterisk to me is like a legal way out, if someone tries to challenge it’ Male, Stirling

‘It must be good because it’s only £35 road tax, which is probably the lowest’.

Male, Cardiff

‘Well, it’s just a random figure (grams of CO²/km). Unless they compare it to something it’s just a random figure’.

Female, Cardiff



‘I think the Citroen one hit the nail on the head. The biggest claim that it made was that it’s cheaper’.

‘Yes, which is one of the main reasons I’ve considered it’.

Exchange in Chesterfield

‘That would sell it to me, the fact that it has very low road tax. That’s more important to me than the environment’.

Female, Cardiff

¹⁴ Idid

¹⁵ Conservation International is a non-profit organisation that seeks to protect Earth’s biodiversity hotspots, high-biodiversity wilderness areas as well as important marine regions around the globe. It is in no way connected to Starbucks.

Comments are colour coded to reflect which of the 3Cs they best represent:

● Brown = clarity ● Blue = credibility ● Green = comparisons



22%

Number of consumers agreeing that it's not possible these days for companies to make false claims about environmental performance



'I take more notice of how many miles to the gallon you get out of it [than g CO²/km] thinking it must be better for the environment and cheaper to run'

Female, Chesterfield

'There's just a complete conflict of interest. You know, our main source of revenue is petroleum, we're not going to look for a better or more environmentally friendly way. We're just going to bury it'

Male, Chesterfield

'Different stores have their own labels and there's no consistency between them so it can be confusing'

Male, Chichester

'When you've got so many cars pitching against each other you just kind of lose any interest, they're all making these claims so none of them stand out'

Female, Stirling

58%

Number of consumers who think an advert endorsed by an environmental organisation would give them confidence in a green claim

The one exception to smaller supporting text was in relation to the use of website links, which most participants took confidence from:

'At least it gives you the choice to go and do further research to the website, etc. I think I'd feel a bit more comfortable, but I don't know if I would go to the website'

Female, Chichester

'Yeah, that's what would sell it for me, there's something on there you could go and have a look at to prove their claim'

Male, Chichester

2. Brand & brand 'fit'

A key perceptual filter that consumers used to assess green claims was their wider view of the brand and how the brand fits with environmental responsibility. Their reactions were therefore subject to a form of confirmation bias – leading them to accept and believe claims that made sense (ie, a brand with which they have positive associations and/or believe is consistent with environmental responsibility). For example, many participants made instant references to certain brands, like Bosch, being trustworthy and this evidently gave these brands a head start in terms of the believability and acceptance of the specific green claim:

'Bosch is one of the better quality appliances. It's more expensive, but it has a very very good reputation'

Male, Chichester

'I think Co-op has quite a good reputation, along with Waitrose, like with responsibility for things like animal cruelty and also the environment'

Female, Chichester

In contrast, participants were more suspicious of certain brands and this 'brand baggage' affected their assessment of the specific green claim. Sometimes this was linked to poor personal experiences as well as wider attitudes – some participants, for example, took issue with an ad from a single energy company because of recent price rises by **all** energy utilities:

'I think they are a disgraceful company because they overcharged me'

Female, Cardiff

'It says that they'll invest more than £1.5 billion, well how much have they actually made?'

'My first thought on this was that they've overcharged everyone over the last five years and still not put the prices down so they can afford to pay'

'In other words they've got £1.5 billion in the pot from overcharging us for the last five years'

Exchange in Chesterfield (referring to an energy utility company)

Likewise, participants were evidently making judgements not just on brand but also on product sector, ie, can a petroleum company, 4x4 producer or airline be environmentally responsible? Reactions to brands led some participants to immediately reject the ad, irrespective of the claim, because it conflicted with their belief that these sectors are incompatible with environmental responsibility:

'There's just a complete conflict of interest. You know, our main source of revenue is petroleum, we're not going to look for a better or more environmentally friendly way. We're just going to bury it'

Male, Chesterfield

'My first impression, and I hadn't even read it, it looks like a four wheel drive so how can it be environmentally friendly when you can buy a smaller car? So I wouldn't even read that'

Female, Chichester

These industries do have a significant impact on the environment and on the one hand, it is good to see that they are starting to address these impacts. Publicly made green claims can be seen as encouraging because it signals some changes in emphasis by the company in recognition of their responsibility to the environment and consumer demand. But our research shows consumers are savvy and are sceptical about 'greenwash' from companies. Claiming environmental credentials for one 'hero' product in a portfolio of 'villains' is a high-risk strategy. These industries still face an uphill battle to convince the public they are changing their ways.

The research also picked up some issues around how green claims in advertising match marketing incentives offered in the same advert. We found evidence of companies making green claims in ads accompanied by marketing incentives for distinctly non-green prizes. For example, offering the chance to win a holiday to an overseas destination, part of which involved a long-haul flight, when promoting an electrical product on its green credentials. Examples such as these provide an inconsistent message to consumers and may increase cynicism and decrease trust in company motivations around green claims.

'What's it got in it? It must have more strong chemicals to be able to wash without the heat being there.'

Male, Chesterfield

'I've got a daughter who loves Ketchup and you cannot get it out at less than 40 and sometimes I even have to put it on 60 on a white shirt.'

Female, Chesterfield



'I love it, best stuff I've tried – I couldn't believe it – 15 degrees – I've tried it.'

Female, Stirling

'It's very effective, never mind to the environment but to your pocket because if you're not heating water to wash your clothes then you're saving money.'

Male, Stirling

'I like the advert, it's quite simple, there's not too much going on. No writing at the bottom and no asterisks'

Female, Chesterfield

Comments are colour coded to reflect which of the 3Cs they best represent:

● Brown = clarity ● Blue = credibility ● Green = comparisons

Fig 5: How believable are the ads?

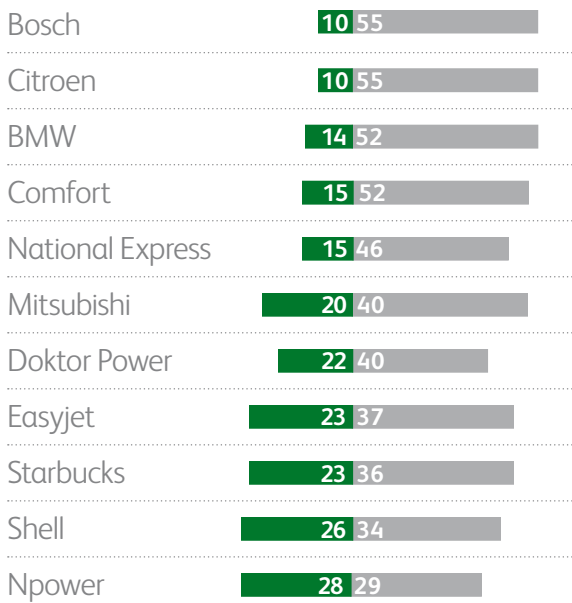
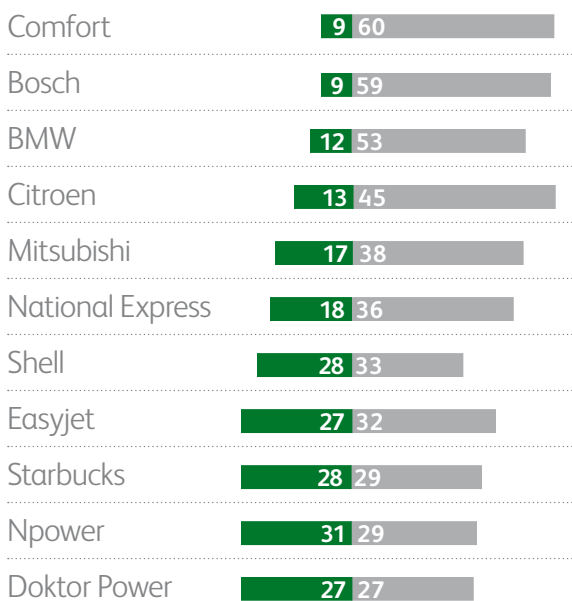


Fig 6: Are the ads from a company they trust?



■ % Rated 1-4 ■ % Rated 7-10 1=weaker & 10=stronger

Source: Our online survey

These findings on the influence of brand perceptions are also backed up by the results from our online survey. Consumers were asked to rate 11 of the core ads from one to ten (one = weaker and ten = stronger) according to a range of criteria and there are marked similarities between an ad's overall 'believability' and the extent to which consumers feel the ad is from a company they trust. Bosch, Citroen, BMW and Comfort receive the highest ratings in both respects, in contrast to Starbucks, Shell and Npower.

3. Ingrained habits and beliefs

When judging green claims, people draw on their own experiences, where they have them, or their *expectations of experience*, where they don't. Participants' reaction to washing at 15°C – is a good example of this. A few had tried this and had positive experiences and therefore they were much more likely to believe the claim in adverts. By contrast, others who had not tried it expressed reservations because their default assumption was that a 15°C wash could not be as effective as washing at higher temperatures:

'I love it, best stuff I've tried – I couldn't believe it – 15 degrees - I've tried it'
Female, Stirling

'I don't think that kills things. I've got animals so I quite like to hot wash bedding and stuff'
Female, Chichester

4. The wider market & societal context

One final contextual factor that sets the backdrop against which consumers judge a specific claim is the wider market and social context. We have already covered consumers' default judgements as to whether ads have been vetted prior to release. A second factor to consider here is what can be best described as 'the power of the documentary'. There were many examples in the discussions where consumers from all groups drew strongly on documentaries/news stories that they had seen about an environmental issue or specific company.

'I recently saw a film about fair trade, it was for the Open University, and apparently it's not as good as you would, like, hope it was so I deliberately don't buy fair trade'

Female, Chichester

'Particularly the recent Jamie Oliver programme where he was getting consumers to pick out the British Pork products and it was the labelling and the logos and the small print, you know, 'produced in the UK', and it wasn't – it was imported and packaged here. It really exposes you – if they do it with pork, what else?'

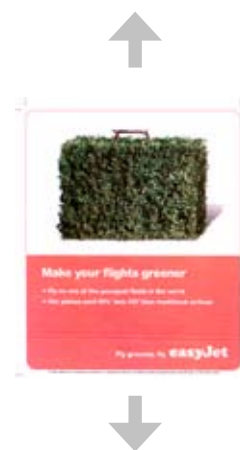
Male, Chichester

'It's attractive and well done, but the whole, I don't know, image of Easyjet, that just doesn't ring true to me. I know nothing about it but I'd be sceptical'.

Male, Chesterfield

'Telling you because they've got to tell you but they'd really rather you didn't read it'.

Female, Chesterfield (referring to the small text at the bottom of the ad)



'The rule of thumb is that small print is usually bad news'.

Male, Cardiff

'You don't know if it's true or not – it's just a statement that they've said their planes emit 30% less but how do we know that?'

Female, Stirling

'It's comparing itself to an older model but it doesn't tell you who – it just tells you of a similar size'.

Male, Chichester

Comments are colour coded to reflect which of the 3Cs they best represent:

● Brown = clarity ● Blue = credibility ● Green = comparisons

This exposure to the alternative arguments, in the case of fair trade, and misleading claims, in the case of labelling, has helped to breed scepticism among consumers. However, there can be a fine line between scepticism and cynicism. Without confidence in claims, we see that consumers can be reluctant to exercise their green purchasing power, as they no longer know who or what to believe. This puts the whole market for the 'green pound' in danger and might damage the virtuous circle of companies promoting their green products, consumers choosing them over non-green products, thereby encouraging business towards greater greenness¹⁶. With the impact of the media in mind, it is also interesting to note that Starbucks comes low down in both the believability and trust ratings in our survey, which can perhaps be attributed to the recent negative media publicity on water usage.¹⁷ This may have done a fair bit of damage to the brand's credentials, eroding consumers' ability to find their claim credible.

Comparability

The research demonstrates that valid and useful comparisons are in strong demand among consumers because they help them navigate their way through the multiple claims and offers that are presented to them on a daily basis. There is some degree of overlap here, in that comparisons – done well – aid both the clarity of a claim and its credibility. Participants highlighted the following aspects of what makes a useful comparison for them:

- Relative and absolute comparisons were demanded to help to understand if a claim offers something that is above and beyond 'business as usual':

'But then I don't know even how long other products take to biodegrade so for me there's no comparison at all. That doesn't tell me if it's any better than anything else'

Female, Chichester

'So if it's the best of the seven seaters, where does it rate overall? Way down'

Male, Chesterfield

- **Meaningful comparisons:** All groups struggled with measures of grams of CO₂/km used in car ads. Some of those classified as high-green receptivity did understand this term but it was a definite minority. Instead – in relation to cars – consumers used road tax bands as a proxy for environmental performance. Many were keen on this way of deciding whether a car advert with a green claim was valid or not because it provided them with clarity in comparing one car with another:

¹⁶ http://www.futerra.co.uk/downloads/Greenwash_Guide.pdf

¹⁷ <http://www.guardian.co.uk/uk/2008/oct/06/water.drought>

'Well it's just a random figure [g CO²/km]. Unless they compare it with something it's just a random figure'

Female, Cardiff

'I mean it's stating g CO² but unless you've looked into what's good and what's bad you just see the number you don't know where on the scale that is'

Female, Stirling

'The road tax is £35 a year which is very cheap. So that is saying something about the emissions straight away because if it were higher then the road tax would be a lot higher'

Male, Cardiff

This research shows that using a proxy that is meaningful to consumers is a good way to get them engaged in these green issues. Government, consumer organisations and other relevant stakeholders should work with companies to help them develop consistent and consumer friendly ways of communicating technical green claims.

■ **Standardisation and the consolidation of standards** – this emerged as a priority area, with several participants highlighting the amount of different labelling schemes – echoing the findings of our previous research¹⁸ – while others pointed to both the A-G ratings on white goods and the healthy eating traffic light as good practice examples to follow:

'Where possible, we do; where possible, we don't – it's ambiguous'.

Male, Cardiff

'It's got 'where possible', the use of materials...whatever suits them...are they really going out of their way to do this?'

Male, Stirling



'Bosch is one of the better quality appliances. It's more expensive but it has a very, very good reputation'.

Male, Chichester

'If they're going to offer an incentive, offer an eco one – not a trip to Florida'.

Male, Chichester

'Up to the free trip to Disney World, I think it was good'.

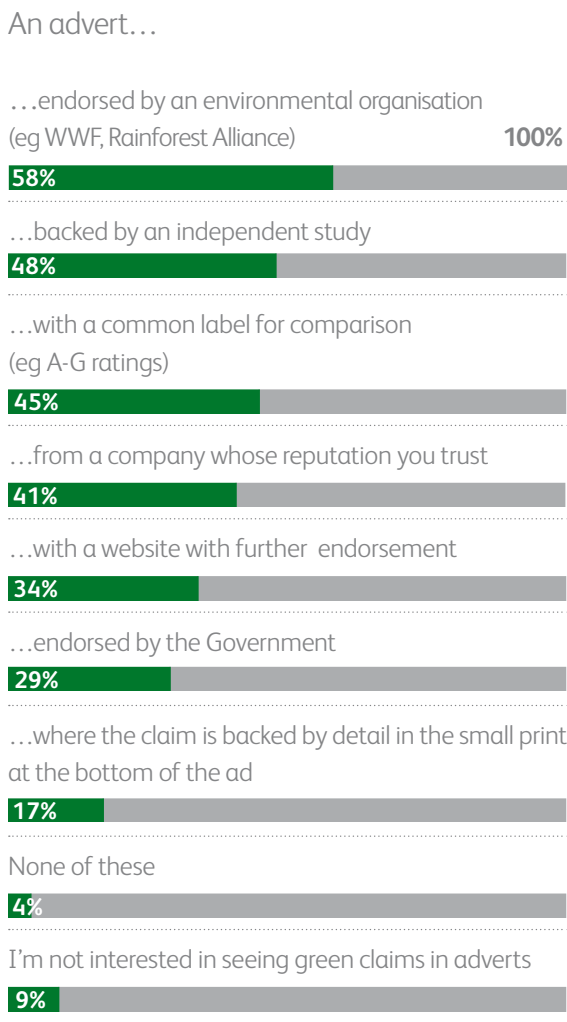
Male Chesterfield

¹⁸ Bamboozled, Baffled and Bombarded: consumers' views on voluntary food labelling, NCC (2004)

Comments are colour coded to reflect which of the 3Cs they best represent:

● Brown = clarity ● Blue = credibility ● Green = comparisons

Fig 7: Thinking about what would make you confident in a green claim made by a company, which, if any, of the following would you personally need to see?



'Different stores have their own labels and there's no consistency between them so it can be confusing'

Male, Chichester

'I think we went through a phase where it was all about your calories and fat and everything like that in your food and that's quite well indicated now, but how recyclable a product is, or how environmentally friendly it is, that's not clear'.

Male, Stirling

The danger for green products and claims, as the number of products and claims expands, is that the sheer amount of information drowns out the ability of consumers to make like-for-like comparisons and ceases to provide them with any useful means of differentiation. This point was neatly made in the discussions, as follows:

'When you've got so many cars pitching against each other you just kind of lose any interest, they're all making these claims so none of them stand out'

Female, Stirling

Standardisation and the consolidation of standards cont.

The findings of our 3Cs model were further echoed in our online survey where we asked a question about the elements of a green claim that would give consumers the most confidence. The results show that third party endorsement from an environmental organisation (such as WWF or Greenpeace) was the most popular response (58 per cent), followed closely by the backing of an independent study (48 per cent), a common label for comparison (45 per cent) and ads from company they trust (41 per cent).

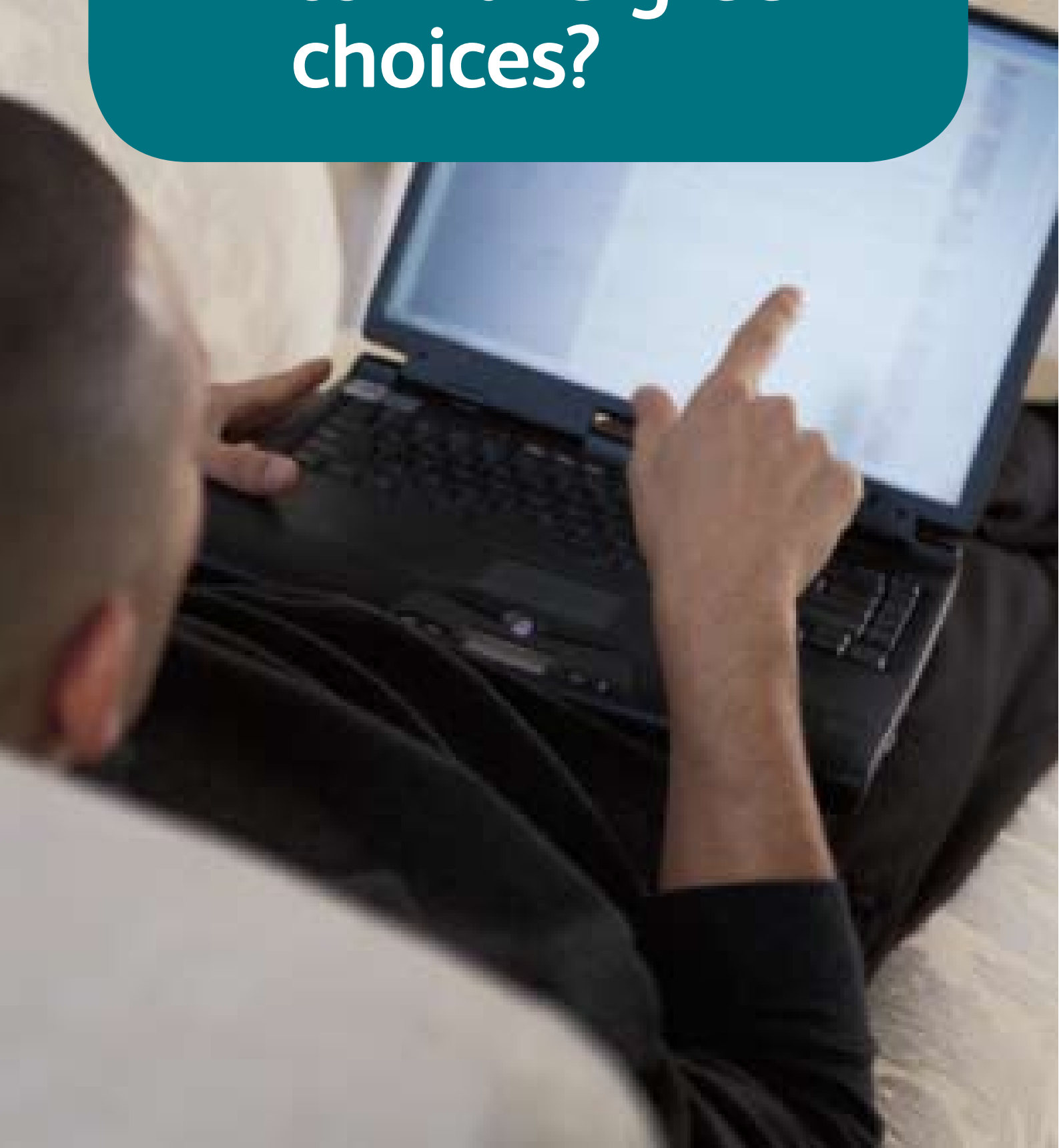
In contrast, direct endorsement from Government (29 per cent) – although important for some – is a second order consideration, while there is little demand for additional detail provided as a footnote (17 per cent). It is also noteworthy, as a reminder of the interest in green information across a broad spectrum of consumers, that only around one in ten (9 per cent) say that they are not interested in *any* information relating to environmental performance.

‘There’s no standard. Well, there’s a couple of standards, but there’s so many there’s no consistency between them’
Male, Chichester

‘That one hits you with the eco-friendly straight away’
Male, Cardiff

‘When you’ve got so many cars pitching against each other you just kind of lose any interest, they’re all making these claims so none of them stand out’
Female, Stirling

7 What else do consumers need to make green choices?



This section looks at two barriers that emerged repeatedly in our research: cost and performance. Sometimes these appeared to be perceived rather than real barriers, but nonetheless have become established 'rules of thumb' by which consumers judge both the relevance and validity of a green claim, as well as deciding whether to make an environmentally responsible purchase or not.

Our online survey highlights a growth in the number of consumers making environmentally responsible purchases, as well as a corresponding increase in consumers looking for green information. However, the market remains relatively niche in terms of the proportion of consumers habitually making green purchases, while interest in environmental information is not evenly distributed across product categories (it is higher in relation to food, electronic and household cleaning products and lower in relation to travel, tourism and banking).

The focus groups found much the same, with participants' largely 'entry level' environmental behaviours (eg, recycling) supplemented by purchases of products like Fairtrade, free range and A/A+ rated white goods. Our research brought out

two important barriers to uptake of those products and services making green claims, even though it was not a main topic of the discussion: cost and performance.

Our research shows that it is imperative that products and services for which have made green claims satisfy three objectives for the consumer: improved environmental quality, cost and performance. Misjudging either or over-emphasising the former at the expense of the latter can mean that consumers can fail to respond. Other research¹⁹ also backs up the idea that green products have failed because of green marketers' myopic focus on their products' greenness over the broader expectations of consumers on cost and performance.

'I think the Citroen one hit the nail on the head. The biggest claim that it made was that it's cheaper'
Male, Chesterfield

¹⁹<http://www.greenmarketing.com/files/articles/Stafford-MyopiaJune06.pdf>

Cost

The price of green products, while not a prompted topic of debate in the focus groups, nonetheless emerged repeatedly as one of the main reasons why participants said they were not buying more. Whether or not this barrier is real or perceived is largely immaterial, in that it is now a default 'rule of thumb' that consumers use to make product choices. In discussions, those adverts which made a dual appeal to environmental as well as cost benefit were received particularly well.

'If money wasn't an issue I'd get it all the time. But especially at the moment you just can't do it'

Male, Chichester

'I think the Citroen one hit the nail on the head. The biggest claim that it made was that it's cheaper'

Male, Chesterfield

Confidence in performance

A second barrier to emerge concerns the issue of performance, and specifically whether environmentally responsible products are 'as good' as their standard equivalents. The conventional wisdom is that green products don't work as well as standard ones. For example, consumer perception of green household cleaners that were first introduced in the 1960s and 1970s were that 'they cost twice as much to remove half the grime'.²⁰ Today, however, many green products are designed to perform better than the standard alternatives. In our research, the issue of performance emerged particularly in relation to cars and cleaning products, and less so in relation to food products where consumers perceive environmentally friendly goods – via organic and local produce – to be better quality:

'I've considered buying one of the environmentally friendly cars recently, low emissions. But you automatically think it's going to be less powerful and less performance'

Female, Chesterfield

²⁰ R. Leiber, 'The Dirt on Green Housecleaners,' Wall Street Journal, 29 December 2005

'There's got to be that many things in it in order for it to do all the claims that it says, that it can't possibly be. It's either one or the other. It's either strong and it removes everything, and it's dangerous, or it's environmentally friendly and don't work. It can't be both'

Male, Cardiff

'I don't believe it is environmentally friendly. If it hasn't got bleach in it must have something else bad to do the job!'

Male, Chichester

As already noted, previous experience of specific products is a powerful influence on perceptions. However, at the current time consumers do not necessarily have a widespread, collective experience of green products and so decisions continue to be made on the basis of default expectations about how a product will perform, rather than actual experience.

'I don't believe it is environmentally friendly. If it hasn't got bleach in it must have something else bad to do the job!'

Male, Chichester

'I've considered buying one of the environmentally friendly cars recently, low emissions. But you automatically think it's going to be less powerful and less performance'

Female, Chesterfield

Fig 8: Do consumers think the claim would have significant environmental benefit?

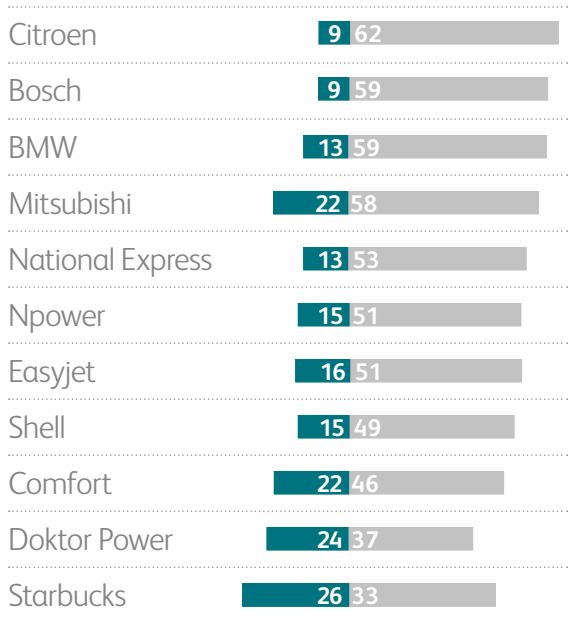
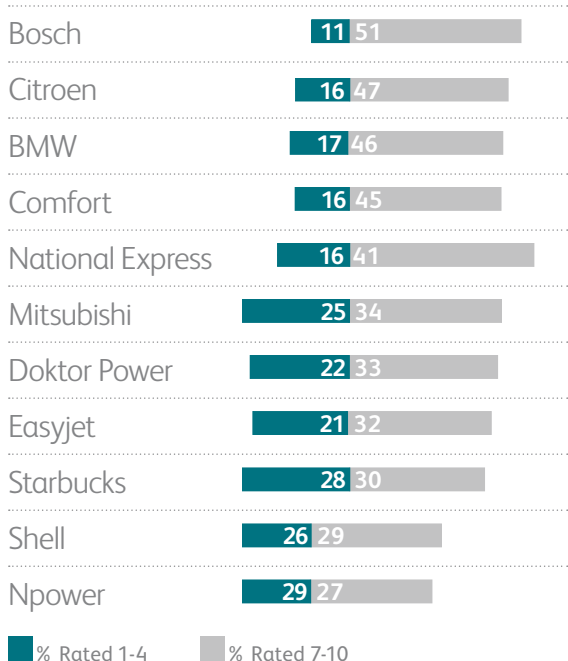


Fig 9: Do the ads influence consumer choice?



Source: Our online survey

I'd love to know if anyone in this group has put a white T-shirt, pair of jeans or whatever with ketchup or wine on it, into a 15°C wash and it has come out'

Male, Stirling

'It's something that I would go and buy every day. And if it's going to be better for the environment as well as good at what it does then I would buy it'

Female, Chichester

A similar pattern is also evident in the online survey – consumers' perceptions about the potential environmental impact of a claim are not closely aligned to those claims that they say are most likely to influence what they buy. So, for example, even though consumers perceive the claims from Comfort and Doktor Power to offer less in terms of environmental benefit, both of these claims rank highly in terms of what might influence their purchasing decisions. These are both smaller, less expensive purchases and this shows us that there is still a long way to go in moving green products from niche, small purchases to the mainstream. Greener products will clearly stand a better chance of becoming more mass market if they are aspirational and can appeal to consumers' wider concerns of cost and performance.

8 Conclusions and recommendations



Conclusions and recommendations

Our research demonstrates that although consumers can be sceptical of the green claims that companies are making, we did not detect widespread cynicism - which would act as a much more fundamental barrier to progress of growing the 'green pound'. Consumers are increasingly aware and responding to environmentally responsible products. This applies across a broad spectrum of consumers, not just the assumed 'green elite', giving a huge potential to engage consumers in living more sustainable lifestyles.

Nonetheless, the danger for green products and claims, as the number of products and claims expands, is that the sheer amount of information drowns out the ability of consumers to make like-for-like comparisons, and ceases to provide them with any useful means of differentiation. It is key for companies to consider that sometimes it may not always be best to jump on the 'green bandwagon'. We want companies to improve their environmental performance but it could be that the way to increase sales might be to emphasise other issues that are important to consumers, with greenness not necessarily playing the defining role.

2009 offers a good opportunity for the standard of green claims being made by companies to be improved – both the Defra Green Claims Code and the CAP and BCAP Codes on environmental claims are up for review. This creates the chance to strengthen the rules and norms around green claims as well as the opportunity to engage a variety of

companies on these issues. This can help to ensure that consumers will be both protected from spurious and misleading claims as well as enabled to make more informed green choices.

These changes are also in companies' self-interest – consumers can reward companies that offer what the public wants in terms of greenness, performance and cost expectations. But companies must keep in mind that consumers also have the power to vote with their feet if they see a green claim they don't believe, understand or trust. Companies need to make sure that the green claims they are making are an integral part of their business, rather than an add-on that could be perceived as 'greenwash.'

- The revision in 2009 of the Government's Green Claims Code and the CAP and BCAP Codes, which cover environmental

The research demonstrates that customers, in order to have more confidence in green claims, want:

Clarity

clear and unambiguous language and imagery

Credibility

realistic, accessible, verifiable and endorsed claims

Comparability

simple, meaningful and like-for-like comparisons

claims, should incorporate the 3Cs identified in this consumer research. Particular attention should be given to the issue of comparison, which is insufficiently dealt with in the current Codes. Comparison advice should cover relative and absolute comparisons, meaningful comparisons as well as standardisation and consolidation of standards.

- Government (Defra) should work closely with its stakeholders to develop and agree definitions, both in meaning and application, for widely used green claims. Industry must also play an active role in shaping the definitions and methodologies that govern different industry sectors to ensure that there is buy in from all relevant stakeholders. This will enable improved communication on the environmental performance of products and services.
- Government, NGOs and consumer organisations to work with companies to help them develop ways of communicating complicated environmental information in a way that is meaningful to consumers.

Proxies are a useful way for consumers to understand complex environmental information. The majority of consumers find it hard to understand g CO²/km but are happy to use road tax bands as a way to process the environmental impact of cars.

- The ASA needs to increase its profile on green claims among the public, publicising its enforcement role further, so consumers can have more confidence in the fact that the green claims companies make are truthful.

Only 22 per cent of consumers think that it's not possible for companies to make false claims about environmental performance,

whereas twice as many disagree (42 per cent). If we are to shift consumer behaviour to more sustainable patterns of consumption, it is essential that consumers have trust and confidence in the green claims companies make.

- Companies should, where relevant, provide meaningful comparisons for consumers. Consumers want to be able to compare claims made on different products but do not like comparisons they can't understand, or the proliferation of different labelling schemes. These offer little or may even undermine the relevance and usefulness of a green claim. Better information, not necessarily more, should be a cornerstone of empowering pro-environmental consumer choices.

This is also relevant when looking at how green claims match marketing incentives offered in the same advertisement. We found evidence of companies making green claims in ads accompanied by marketing incentives for distinctly non-green prizes. For example, offering the chance to win a holiday to an overseas destination, part of which involved a long-haul flight. This provides an inconsistent message to consumers and can increase cynicism and decrease trust in company motivations around green claims.

- When making green claims, companies must also consider other customer satisfaction factors of cost and performance.

It is imperative that products and services for which have made green claims satisfy three objectives for the consumer: improved environmental quality, cost and performance. Misjudging either or overemphasising the former at the expense of the latter can mean that consumers can fail to respond.

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