

CEPE Guidance on Self-Declared Environmental Product Claims for Decorative Coatings



When making environmental claims that are not certified or validated by third parties, CEPE members of the decorative coatings sector should respect the following guidelines.

Self-declared claims should:

1 Be formulated in an honest, clear and concrete way

Example 1: An environmental claim “environmentally friendly” or “more sustainable” is not accurate enough. The claim should indicate which environmental aspect is improved with this specific product, like for example diminution of VOC emissions, optimization of use of fossil or natural resources, the product’s durability, etc.



2 Reflect a meaningful benefit to the environment

Example 2: An environmental claim like “does not contain substance X” for a particular DIY decorative paint does not reflect any benefit to the environment when this substance X is forbidden and the ‘non-containing’ is just a matter of compliance with the law. In that case the claim would not be meaningful and could even be misleading to consumers,

making them believe that other paints do contain substance X.



3 Be measurable and verifiable by using scientific standards or other evidence

Example 3: An environmental claim “biodegradable” for a particular DIY wood paint can be made only when appropriate and recognized tests have been carried out to prove the biodegradability of the product.

4 Take the whole Life Cycle of a product into account.

The claimed benefit should not have been achieved by neglecting other aspects of the product (such as use of hazardous or scarce ingredients) or manufacturing processes with negative environmental impacts.

Example 4: An environmental claim for a paint containing a naturally occurring renewable material in replacement of a petrochemical makes sense since it helps to preserve non-renewable fossil resources. However, if the manufacture of this specific renewable material would use very high amounts of water, pesticides, energy, etc., then its environmental impact might be higher than that of the petrochemical equivalent, cancelling the environmental benefit of the paint.

An extensive CEPE glossary of sustainability-related definitions is available for members via the CEPE Workplace.



Via a consultation among the National Associations the CEPE members were given the opportunity to comment on its content and implications. The above final version now forms the adopted guideline for the CEPE members.

Explanatory background

1. The use of environmental claims in promoting products.

Market trend

There are at the moment in the EU an increasing number of product claims that relate to environmental and/or social performance, also referred to as sustainability claims.

There are two main drivers behind this market trend:

- European consumers are more and more willing to buy products with reduced environmental impact and improved social benefit, embracing the new global development model where social satisfaction is fully replacing the customer satisfaction concept
- Several policy initiatives in the EU are at the moment increasing in importance: sustainable consumption; green public procurement, eco-label etc.

The European decorative coating industry is actively following these trends and has already placed on the market a number of products and brands and is also using manufacturing processes with clear sustainable benefits.

Fragmented regulatory background

Today, there is no EU legislation prescribing how to make sustainable claims. The European Ecolabel and green public procurement are the only European initiatives.

Some National Authorities' initiatives (e.g. France, UK) lead to policy documents on sustainable claims, but this is relatively new, not specific to paint and not yet available in most EU countries.

Environmental product claims can also be made via "ecolabels", either national ones (Nordic Swan, Blaue Engel, NFE, etc.), or private organization owned ones (Ecocert, etc.). However with "ecolabels" being numerous and country dependent, it is not easy to have clarity, understanding of underlying criteria, and transparency.

In addition, labels are based on a set of fixed criteria, and can't be used for promoting innovative products.



2. What is a self-declared environmental claim:

ISO defines three types of environmental claims:

- ISO 14024 - Type I: third party or independent certification labels (e.g. EU Ecolabel, Nordic Swan, etc.)
- ISO 14021 - Type II: self-declared claims
- ISO 14025 - Type III claims: Environmental Product Declaration (EPD), based on full Life Cycle assessment (LCA) (e.g. EPDs, FDES)¹

This CEPE guidance document relates only to self-declared environmental claims as defined in ISO 14021.

A self-declared claim is made by the supplier himself, about one or more attributes of his product and without verification or certification by a third-party. Such claims are usually (but not always) based on a single attribute.

Commonly found Self-declared claims can be: waste reduction; recyclable; recycled content; renewable; organic/natural origin; reusable; reduced water consumption; reduced energy consumption; uses green energy; reduced carbon footprint; degradable; free of "X"; extended service life; etc.

3. Justification for this CEPE guidance:

CEPE believes that it is essential to agree on guidance for the European Decorative Coating Industry for the following reasons.

Communication & Marketing reasons

- Avoid the Industry not being respected when advertising innovative products or processes.
- "Greenwashing" exists in our sector (e.g. "Bio" paint, etc.), mostly resulting from a lack of understanding of the issues. A CEPE policy will help members' marketing departments in a practical way, clarifying the border between a real claim and "greenwashing" and supporting the good reputation of our industry's marketing practices.
- Avoid potentially unhelpful and costly inter-company challenges on environmental claims among members.
- Those who consider buying our products want information that is clear, honest and comparable between two products of the same family.

¹See glossary for definitions of EPD and LCA. FDES is the French format for EPDs : Fiche de Déclaration Environnementale et Sanitaire



Policy reasons

- There are already national regulations and guidelines appearing (e.g. in France and in the UK) and the next step could be a text at EU level. Having a CEPE policy on sustainable claims already prepared would make the discussion/negotiation of a potential future EU policy much easier for the Industry.
- If the Industry is not proactive in defining its own guidelines, a standard could be imposed that would hamper product development and differentiation.
- CEPE must have credibility when discussing other EU legislation or policies related to sustainability. A voluntary and transparent CEPE policy on sustainable claims will be a strong communication vector for the Industry.
- A transparent and positive CEPE position (at EU level) may help National Associations negotiating at country level when specific regulations emerge (e.g. Grenelle in France).
- Recognition of CEPE by the international scientific and technical communities as an accredited partner when dealing with global innovative health related matters influencing the existing industrial technologies and chemical processes.

Additional reasons

- This policy will help define clear and scientifically reliable boundaries for a system to be declared “eco-sustainable”.
- Provide a basis for interaction with labels on building level (BREEAM, DGNB, HQE, etc).

4. References and policies from authorities:

The United Kingdom, France and the European Commission have already issued policy documents to guide or regulate the use of Self-declared claims. CEPE’s policy intends to follow the most relevant aspects of these 3 existing guides and adapt them to the needs of the Decorative Coating Industry, implementing them beyond the local national borders as well as strengthening its “Super Partes” accredited role.

DEFRA’s Green Claims Guidance on environmental claims

Department for Environment, Food and Rural Affairs

France’s Ministère de l’Ecologie / Ministère de l’Economie



The EU DGHC Guidelines for Making and Assessing Environmental Claims

European Commission Directorate General Health and Consumer Protection

References:

CEPE Glossary of Sustainability Related Definitions

http://cepe-myeteam.eudata.be/EPUB/easnet.dll/GetDoc?APPL=1&DAT_IM=105F9B&DWNLD=2012-09-19%20-%20CEPE%20draft%20glossary%20of%20sustainability%20related%20terms%20FINAL.pdf

ISO 140121: Environmental labels and declarations -- Self-declared environmental claims (Type II environmental labelling)

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

European Commission, Directorate-General Health & Consumer Protection. Guidelines for Making and Assessing Environmental Claims Link:

http://ec.europa.eu/consumers/cons_safe/news/green/guidelines_en.pdf

United Kingdom; DEFRA: Green Claims Guidance (2011)

<http://www.defra.gov.uk/publications/2011/06/03/pb13453-green-claims-guidance/>

France; Ministère de l'Ecologie; Ministère de l'Economie: Guide pratique des allégations environnementales (only in French)

<http://www.economie.gouv.fr/cnc/guide-des-allegations-environnementales>

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