

FTC Environmental Marketing Guides

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FTC Act

- Tell the truth
- Have substantiation



Ask:

- What claims does my ad convey to reasonable consumers?
- Do I have competent and reliable evidence to back up the claims?



FTC's Green Guides

- Apply to all forms of marketing claims
- Apply to business to consumer and business to business claims
- Don't set performance standards or eco-labels



General Guide Principles

- Consumer perception of claims controls
- Use specific claims
- Don't overstate product attributes
- Use clear & prominent qualifications



Types of Marketing Claims

- General environmental benefits
- Degradable and biodegradable
- Compostable
- Recyclable
- Recycled content



General Environmental Claims



Eco Friendly

- General claims may be confusing
- Identify specific “green” attributes



Biodegradable



Difficult for products to biodegrade in a landfill





FTC Alleged Unsubstantiated Biodegradable Claim



“Bamboo Fiber” Textiles

- Actually are rayon
- Do not retain natural attributes of the bamboo plant such as anti-microbial properties



Seals & 3rd Party Certifications

Seals

- May imply superiority
- May need to qualify claim
- Explain basis for award

Certifications

- Independent, with expertise
- Certification does not insulate advertiser
- Avoid broad claims



**Earth Smart
Certified**



Green Guides Review

- Federal Register Notices
 - Seeking comments on the Guides & new green claims
- Public Meetings on Emerging Issues
 - Carbon Offsets and RECs
 - Green Packaging Claims
 - Green Buildings and Textiles
- Consumer Research



More Information

Green Guides
16 C.F.R. Part 260

www.ftc.gov/green

