



British Plastics Federation

**Guidance on the use of the terms
'bio-based', 'biodegradable',
'compostable', 'oxo-biodegradation'
and other environmental claims on
plastic products**

**Stronger
Together**

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Who is this guidance for?

All companies that produce plastics materials and additives and/or sell plastic products in the UK which are manufactured from bio sources and / or are intended to initiate degradation or to degrade or biodegrade at end of life and / or;

All parties who;

- Currently make environmental claims about plastic products
- Are considering how to market the environmental attributes of their plastic products
- Are receiving queries from customers about the environmental performance of their plastic products and are considering how to respond.

This guidance for best practice has been developed to provide clear, user-friendly advice for companies in the plastics sector who are or are considering making environmental claims about their products. This guidance applies to environmental claims included in labeling, advertising, promotional materials and all other forms of marketing and communication.

Promoting the use of clear, accurate and relevant environmental claims in marketing and advertising is the key aim of this guidance. By providing accurate information about the environmental effects and qualities of products, environmental or 'green' claims can often help consumers to make informed buying choices. Conversely the use of misleading, false, meaningless or unclear information can result in a loss of consumer confidence and unfair business competition.

This guidance has been developed by the British Plastics Federation to assist companies in ensuring that self-declared environmental claims are meaningful and in line with UK / EU legislation and existing standards or codes, namely the DEFRA Green Claims Code (2011), International standard ISO 14021 and European Commission Guidelines for making and assessing environmental claims.

This guidance is not intended to supersede existing UK / EU legislation, mandatory Advertising Codes and/or government guidance which will still be the key sources for ensuring that advertising and marketing are fully compliant in respect of environmental claims.

Best Practice Principles

General principles

- Marketing communications and promotional literature should be truthful, accurate and able to be substantiated
- The same good standards of commercial practice should apply throughout the supply and marketing chain.
- Where possible, the use of third party certification to relevant national & international labeling and standards is recommended
- Consumers should be able to access information to make informed purchases with ease. Technical data should be accessible and presented in clear language. Claims that rely on confidential information for their verification should be avoided.

Making false or inaccurate claims is not only poor business practice but is also illegal and actionable. Such actions are more likely to result in the loss of your reputation and civil or criminal action than they are to produce profitable business.

Environmental Principles

- Environmental claims should;
 - Be specific and relevant to the product in question and the environmental issues connected to it
 - Be transparent, unambiguous, clearly expressed and follow a common-sense approach
 - Be accurate, verifiable, relevant, able to be substantiated and not misleading

- General environmental benefit claims, such as claiming a product to be ‘environmentally friendly’, should be avoided.
- Where environmental claims infer benefits that conform to the law or to industry standards, this must be stated.
- Environmental claims must not imply that they are universally accepted if there is a significant division of informed or scientific opinion.
- Environmental claims should not be presented in a manner that exaggerates the environmental attribute or benefit stated.
- Environmental claims should not be presented in a manner which implies that a product is endorsed or certified by an independent third party organisation if it is not.
- All environmental claims should be reassessed regularly and withdrawn if they are no longer capable of substantiation.

Imagery and symbols

- The use of “green” imagery, such as featuring trees, vegetation or the colour green should be used with great care and be consistent with the environmental performance of the product.
- Third party endorsements, “green” logos, independent certification and kite marks must be depicted clearly; must only be used with the consent of the relevant third party and in such a manner that does not mislead.

Guidance on Specific Environmental Claims

In addition to the guidance given below, it is the claimant's responsibility to evaluate and to provide the data necessary to verify any claim.

For definitions of the terms shown below please refer to the documents listed in Annexes I and 2.

When relying on scientific or other test data, care should be taken that the most appropriate standards, test methods or latest guidance on best practice are used. Several evaluation methods have been developed by national and international organisations for the verification of different claims, examples of which are listed in Annex II.

Products which are marketed as “biodegradable”, “compostable”, “home compostable” or “recyclable” in accordance with a particular standard shall only be made where conformity to the relevant standard can be demonstrated and certification achieved. A written report should be available. Claims that may mislead consumers such as, ‘compliant with BS EN 13432’ must not be used.

Claims relating to tests undertaken in accordance with internationally agreed test methods shall be precise and not general, e.g. “this article contains 65% renewable carbon”. Claims such as ‘tested according to BS8472’ shall be qualified and a written report should be available.

‘Bio-based’

Claims that a product or package is ‘bio-based’ shall be qualified if the product or package is not made entirely from biomass.

‘Biodegradable’

Claims that a product or package is ‘biodegradable’ shall be verifiable and substantiated by competent and reliable scientific evidence as required by the UK Green Claims Code and ISO 14021.

Products to be placed on the UK market and for which a claim of biodegradability is given shall meet the requirements of a relevant test method or relevant standard, such as; BS EN13432. All such claims of biodegradability shall be qualified to the extent necessary to avoid consumer confusion about: (1) the product or package's ability to biodegrade in the environment where it is routinely disposed; and (2) the rate and extent of biodegradation in specific environments.

‘Compostable’

A claim that a product or package is ‘compostable’ shall be substantiated by reliable scientific evidence that all the materials in the product or package will break down into usable compost in a safe and timely manner in an appropriate composting facility. Such evidence shall be technically independent of the influence of any company or associated individuals.

Products to be placed on the UK market and for which a claim of compostability is given shall meet the requirements of a relevant test method or be independently certified to a relevant standard, such as; BS EN13432.

Claims of compostability shall be substantiated to the extent necessary to avoid confusion over how the product can be adequately composted. Unless the product is compostable in any type of facility, compostability claims shall specify whether it refers to a home-composting or an industrial composting facility.

Do not use unqualified claims where (1) Only part of the product is compostable; (2) the package cannot be composted in a home compost pile

or device; or (3) the claim misleads consumers about the environmental benefit provided when the product is disposed of in a landfill or in the open environment.

Claims that a product is compostable in a municipal composting facility may need to be qualified if such facilities are not available to a reasonable proportion of consumers. General statements such as “compostable where facilities exist” shall be avoided.

‘Degradable’

Claims that a product or package is ‘degradable’ (as distinct from biodegradable) shall be substantiated by competent and reliable scientific evidence. Such evidence shall be technically independent of the influence of any companies or associated individuals.

Products to be placed on the UK market and for which a claim of ‘degradable’ is given shall meet the requirements of a relevant test method or relevant standard.

Claims of degradability shall be qualified to the extent necessary to avoid consumer confusion about: (1) the product or package's ability to degrade in the environment where it is routinely disposed; and (2) the rate and extent of degradation in specific environments.

Do not use unqualified claims where the claim misleads consumers about the environmental benefit provided when the product is disposed of in a landfill or in the open environment.

‘Oxo-biodegradation’

Claims relating to ‘oxo-biodegradation’ shall be substantiated by competent and reliable scientific evidence. Such evidence shall be technically independent of the influence of any company or associated individuals.

Products to be placed on the UK market and for which a claim of 'oxo-biodegradation' is given shall meet the requirements of a relevant test method or relevant standard.

Claims of oxo-biodegradation shall be qualified to the extent necessary to avoid consumer confusion about: (1) the product or package's ability to degrade in the environment where it is routinely disposed; and (2) the rate and extent of degradation in specific environments.

Do not use unqualified claims where the claim misleads consumers about the environmental benefit provided when the product is disposed of in a landfill or in the open environment.

'Recyclable'

A product or package shall only be marketed as recyclable where there is evidence that appropriate recycling infrastructure exists.

For products or packages that are made of both recyclable and non-recyclable components, the recyclable claim shall be adequately qualified to avoid consumer confusion about which portions or components of the product or package are recyclable.

Claims of recyclability shall be qualified to the extent necessary to avoid consumer confusion about the availability of appropriate recycling structure. A claim of recyclability shall be avoided on a product which, although technically recyclable, will never be recycled because the collection facilities are not available where it is sold.

'Renewable'

Claims that a product or package is 'renewable' should be used with great care as there is currently no internationally agreed definition for the term.

Claims that a product or package is 'renewable' shall be qualified if the product or package is not made entirely with renewable materials.

For products or packages that are made of both renewable and non-renewable components, the renewable claim shall be adequately qualified to avoid consumer deception about which portions or components of the product or package are renewable.

Claims that a product or package is 'renewable' shall be qualified to the extent necessary to avoid consumer confusion about any non-renewable resources used during the production process.

Complaints about Green Claims

If you think a green claim about a product is untrue or misleading, you can take the following action;

Contact the manufacturer or retailer

If you believe a green claim to be unclear or you want to know more, contact the head office of the manufacturer or retailer making the claim. Ask for an explanation of the claim and whether they use the DEFRA Green Claims Guidance.

Contact trading standards

Where you believe a claim is untrue, or after receiving an explanation from the manufacturer or retailer you still believe the claim to be misleading, you can contact your local council's Trading Standards department. Look for 'trading standards' in the phone book under your local council.

Alternatively use the Trading Standards Institute website;

<http://www.tradingstandards.gov.uk/advice/index.cfm>

Make a complaint about an advert

Complaints about printed advertisements or those on the internet can be made to the Advertising Standards Authority;

<http://www.asa.org.uk/Complaints/How-to-complain.aspx>

Make a complaint via Consumer Direct

You can make a complaint via the consumer protection regulations by contacting Consumer Direct;

<http://www.direct.gov.uk/en/Governmentcitizensandrights/Consumerrights/index.htm>

Annex I

Terminology

ISO 14021:1999 “Environmental labels and declarations – Self declared environmental claims” sets out definitions and criteria for use in self-declared environmental claims.

CEN/TR 15351:2006 “Plastics: Guide for vocabulary in the field of degradable and biodegradable polymers and plastic items”, sets out definitions for terms in the field of degradable and biodegradable polymers.

Annex II

Relevant Standards and Test Methods

Standard Specifications:

ISO 17088:2008 Specifications for Compostable Plastics

ASTM D-6400-04 Standard Specification for Compostable Plastics

BS EN 13432:2000 Specification for packaging recoverable through composting and biodegradation, test scheme and evaluation criteria for the final acceptance of packaging

BS EN 14995:2006 Plastics: Evaluation of compostability. Test scheme and specifications

BS EN13430:2004 Packaging: Requirements for packaging recoverable by material recycling

Certification Schemes:

Association for Organics Recycling (AfOR) Certification Programme for Home Compostable Plastics and Packaging

Standard Methods of Test:

BS 8472:2011 Methods for the assessment of the oxo-biodegradation of plastics and of the phyto-toxicity of the residues in controlled laboratory conditions

ASTM D6954-04 Standard Guide for Exposing and Testing Plastics that Degrade in the Environment by a Combination of Oxidation and Biodegradation

ASTM D6866-11 Standard Test Methods for Determining the Biobased Content of Solid, Liquid, and Gaseous Samples Using Radiocarbon Analysis

CEN/TS 16137:2011 (Plastics) Determination of bio-based carbon content

EN ISO 14855-1 Determination of the ultimate aerobic biodegradability of plastic materials under controlled composting conditions - Method by analysis of evolved carbon dioxide

EN ISO 14853:2005 (Plastics) Determination of the ultimate anaerobic biodegradation of plastic materials in an aqueous system - Method by measurement of biogas production

EN ISO 15985:2004 (Plastics) Determination of the ultimate anaerobic biodegradation and disintegration under highsolids anaerobic-digestion conditions - Method by analysis of released biogas

EN ISO 17556:2003 (Plastics) Determination of the ultimate aerobic biodegradability in soil by measuring the oxygen demand in a respirometer or the amount of carbon dioxide evolved

EN ISO 14851 – 14852 Determination of the ultimate aerobic biodegradability of plastic materials in an aqueous medium

EN ISO 14853 (Plastics) Determination of the ultimate anaerobic biodegradation of plastic materials in an aqueous system - Method by measurement of biogas production

Useful Resources

BPF Bio-based and Degradable Plastics Group Code of Conduct

<http://www.bpf.co.uk/Document/Default.aspx?DocumentUid=B93F489C-69A2-41B8-A39F-B2AD5394BA2D>

Defra Green Claims Guidance (2011)

<http://ww2.defra.gov.uk/environment/economy/products-consumers/green-claims-labels/>

Defra's Quick Guide to Making a Good Environmental Claim (2011)

<http://archive.defra.gov.uk/environment/economy/documents/green-claims-quick-guide.pdf>

ISO 14021:1999 “Environmental labels and declarations - Self Declared environmental claims”

<http://www.iso.org>

CEN/TR 13688:2008 Packaging - Material recycling - Report on requirements for substances and materials to prevent a sustained impediment to recycling

<http://www.cen.eu/cen/Services/EHD/Sectors/Pages/TransportandPackagingsector.aspx>

European Commission ‘Guidelines for Making and Assessing Environmental Claims’

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

Trading Standards Institute

<http://www.tradingstandards.gov.uk/advice/index.cfm>

Advertising Standards Authority

<http://www.asa.org.uk/Complaints/How-to-complain.aspx>

Consumer Direct

<http://www.direct.gov.uk/en/Governmentcitizensandrights/Consumerrights/index.htm>

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