
ENVIRONMENTAL CLAIMS: LABELLING, MARKETING & PRESENTATION

1. Introduction

UK legislation prohibits unfair practices and places a general duty on businesses to trade fairly. Failure to comply with such legislation is a criminal offence.

This policy gives details of the specific requirements an environmental or green claim must adhere to.

In addition to the requirements detailed by law, as a responsible business, we have made the decision to restrict terms. The policy below details these, from an implementation perspective, no distinction should be drawn between legal restrictions and policy restrictions - all are mandatory.

2. Scope and Definitions

2.1. Scope

This policy applies to all products sold by John Lewis Partnership, both Waitrose and John Lewis own brand and branded products.

John Lewis Partnership applies to the following:

- Waitrose shops
- John Lewis shops
- Leckford Farm shop
- Waitrose.com
- Waitrosecellar.com
- Waitrosegarden.com
- Waitroseflorist.com
- Waitrosepet.com
- Johnlewis.com

The following activity is covered:

For Waitrose and John Lewis own brand products

- Product development
- Product labelling, presentation and description
- Marketing and advertising
- Press / PR Communications both for specific products and non-product (generic) partnership messages

For branded products sold by John Lewis Partnership

- Product labelling, presentation and description
- Marketing and advertising
- Press / PR Communications both for specific products and non-product (generic) partnership messages

This policy must be read in conjunction with:

- [Policy 50197 Waitrose Marketing Policy](#)
- [Policy 50216 Regulatory Requirements for Adverts](#)
- [Policy 50147 Food and Drink Labelling](#)

2.2. Definition of an Environmental Claim

An environmental claim is any claim (whether explicit or implicit and includes colours, pictures, logos, overall presentation) that suggests or creates the impression that a product or service:

- Has a positive impact on the environment
- Is less damaging to the environment than a previous version of the same goods or service
- Is less damaging to the environment than competing goods or services.

3. Interpretation

This guidance document has been produced by the Regulation, Policy and Compliance and Ethics and Sustainability departments at John Lewis Partnership. The contents are not intended to remove the need for suppliers and Partners to develop and maintain knowledge of the regulatory framework necessary for correct labelling, marketing and presentation of product to avoid making misleading green or environmental claims, but where a difference in interpretation exists, the requirements in this document must be applied.

4. Policy Purpose

This policy brings together the requirements for making an environmental claim on a product, service or standard to ensure the customer is not misled. Its purpose is to provide lists of claims that are permitted and prohibited in any medium presented under the banner of the John Lewis Partnership.

5. Policy Requirements

5.1. Waitrose and John Lewis Own Label Products

For Waitrose and John Lewis own brand products, claims or statements that make an environmental claim (according to 2.1) of a product, service or method of production are only permitted according to the claims set out in Annex I of this policy.

5.2. Branded Products

For branded products sold by John Lewis Partnership, JLP reserves the right to request validation of green claims on a product, alter suggested marketing text online to remove green claims or not list a product if there could be a risk to the JLP brand.

6. Policy Implementation

6.1. Claims must be made in line with the following principles

Principles	Explanation
Claims must be truthful and accurate	Claims must not mislead consumers by giving them an inaccurate impression, even if those claims are factually correct. They must only give consumers the impression that a product, service, process, brand or business is as green and sustainable as it really is. Where claims are only true if certain conditions or caveats apply, those conditions or caveats should be clearly stated.
Claims must be clear and unambiguous	Claims should be worded in a way which is transparent and straightforward so consumers can easily understand them. They should not be presented in ways that are liable to confuse consumers or to give the impression that a product, service, brand or business is better for the environment than it is.
Claims must not omit or hide important relevant information	Claims should not just focus on the positive environmental aspects of a product, service, process, brand or business, where other aspects have a negative impact and consumers could be misled. This is especially so if the benefits claimed only relate to a relatively minor aspect of a product or service or part of a brand's or a business' products and activities. Cherry-picking information like this is likely to make consumers think a product,

	service, process, brand or business as a whole is greener than it really is.
Comparisons must be fair and meaningful	Comparative claims should compare like with like. That means: <ul style="list-style-type: none"> • any products compared should meet the same needs or be intended for the same purpose, with a sufficient degree of interchangeability; • the comparison should be between important, verifiable and representative features or aspects of the relevant products; and • the basis of the comparison, and the way it is presented, should allow consumers to make an informed decision about the relevant merits of one product over another.
Claims must consider the full life cycle of the product or service	All aspects of a product's or service's environmental impact over its life cycle, including its supply chain, could be important, including: <ul style="list-style-type: none"> • its component parts; • how and where it is manufactured, produced or carried out; • how it is transported from its place of manufacture or origin; • its use or performance; • the disposal of a product, and any waste or by-products; • the consequences of any environmental benefit claimed and the period in which it would be realised; and • whether the product or service has an overall adverse impact.
Claims must be substantiated	Most environmental claims are likely to be objective or factual claims that can be tested against scientific or other evidence. Given the requirement that claims must be truthful and accurate, businesses should have evidence to support them.

- 6.2. A list of all approved environmental claims / terms can be found in Annex I along with the substantiation required to use the claim.
- 6.3. For claims / terms that are not included in Annex I, an application may be made via a google form.

[Application for new claim to be added to annex I](#)

The claim will be reviewed by the Regulation, Policy & Compliance and Ethics & Sustainability teams and added to Annex I if approved.

6.4. Annex 2 details claims that are not permitted with examples of how they could be presented to be acceptable. Also listed are generic claims not permitted except when in compliance with Annex I.

7. Accountabilities and Responsibilities

This document has been created by the Regulatory Policy Framework, which has ensured that it is consistent with the Partnership Constitution and applicable regulatory requirements. This document will be reviewed annually.

8. Monitoring of Controls

Any new terms proposed will be reviewed by Regulation, Policy and Compliance and Ethics & Sustainability whenever a new term is submitted.

9. Assurance

Assurance on the effective operation of the Policy will be provided to the Regulatory Policy Steering Group at least annually by the Regulatory Policy Manager.

10. Further Information

Further information may be found:

- [CMA Guidance about environmental claims on goods and services](#)
- [ASA Advertising guidance \(non-broadcast and broadcast\) about misleading environmental claims and social responsibility in advertising](#)
- [The Consumer Protection from Unfair Trading Regulations 2008](#)

Annex 1: Approved Claims and Required Substantiation

Certification	Claim / Term	The criteria for use
Better Cotton (BC)	By choosing our cotton products, you're supporting our investment in Better Cotton's mission. This product is sourced via a system of mass balance and therefore may not contain Better Cotton.	Cotton content of the product must be over 40% and be the majority fibre. BCCU'S must be transferred to the John Lewis Account via the Better Cotton Platform.
Global Organic Textile Standard (GOTS) (For generic Organic Claim)	"Made with Organic ""insert fibre"" and/or "Organic""insert fibre"" is grown without the use of chemicals such as fertilisers and pesticides"	Organic content of the product must be over 40% and be the majority fibre. Scope and Transaction Certificates must be provided as evidence for all orders.
Global Organic Textile Standard (GOTS) (For GOTS Certified Product Claim)	"Made with GOTS certified organic ""insert fibre"" and/or Made with organic ""insert fibre"" and also Global Organic Textile Standard (GOTS) certified.	Organic Content must follow the GOT's claims criteria Must have GOTS logo and certification number and must be approved by the Certification Body. Scope and Transaction Certificates must be provided as evidence for all orders.
Global Recycled Standard (GRS) (For generic Recycled Claim)	Made with recycled materials	Product must meet Requirements of the Standard and be labelled accordingly
Global Recycled Standard (GRS) (For GRS Certified Product Claim)	Made with recycled materials	Product must meet Requirements of the Standard and be labelled accordingly. Must have a GRS logo and certification number. Scope and Transaction

		Certificates must be provided as evidence for all orders.
REPREVE	This product contains recycled materials	Product must follow the Repreve requirements Specify part of item made with Repreve if applicable Permitted to use Repreve logo - Must be approved by REPREVE
Downpass	Products labelled with the DOWNPASS guarantee high quality and the certainty that down and feathers used as filling material are ethically sourced and come from tightly controlled and traceable supply chains. In addition, the quality of all products is monitored by independent testing institutes.	100% certified by Downpass Products must have the Downpass label with the Individualised Verification Number on it. Valid Membership Certificate must be provided
Responsible Down Standard (RDS)	RDS Certified	Must be 100% certified down and feather in product. Must have a RDS logo and certification number. Scope and Transaction Certificates must be provided as evidence for all orders.
Sustainable Palm Oil	'Palm Oil Certified Sustainable'	When in compliance with Policy 50012 Responsible Sourcing of Palm Product Specific Only
Marine Stewardship Council	MSC Certified	Fish in compliance with Policy 50176 Marine Stewardship Chain of Custody All claims referencing MSC must be signed off by MSC prior to publication.

Aquaculture Stewardship Council	ASC Certified	Fish in compliance with requirements of Policy 50097 Accreditation to ASC standard
Sustainably Caught or Sourced [species]. In line with The Sustainable Seafood Code of Conduct.	Third Party certified species only MSC,ASC	Fish in compliance with requirements of Policy 50097 Accreditation to ASC for aquaculture species or MSC for Wild capture species Must be accompanied by statement: 'In line with The Sustainable Seafood Coalition Codes of Conduct'
All our fish is responsibly sourced	Generic statement	Permitted for all fish in compliance with 50097
Forest Stewardship Council (FSC)	FSC 100%/Mix/Recycled	On-product claims: supplier to use in compliance with guidance provided by their FSC certification body for use of the trademark Off-product claims: John Lewis is an FSC promotional licence holder. If an FSC claim will be promoted off-product e.g. on a website, sign or brochure, then a supplier evidence letter must be collected and verified by FSC before doing so. Waitrose is not currently a promotional licence holder so off-product claims cannot be promoted.
Programme for the Endorsement of Forest Certification (PEFC)	PEFC Certified/Recycled	On-product claims: supplier to use in compliance with guidance provided by

		their PEFC certification body for use of the trademark
Organic Food	Organic	Food product must be certified to applicable organic regulations and by a third party certifying body
LEAF Marque	LEAF Marque logo	All UK produce growers according to requirements in Policy 50204 Third Party Accreditation for Fresh Produce Suppliers
Recyclable Packaging	OPRL Recycle logos	The appropriate OPRL logo must be applied for all separate components of the packaging
Fairtrade	Label, presentation or advertising	Only to be used on products in compliance with Waitrose Policies 50178 - 50183
Home Compostable	Home Compostable	Only permitted when compostable material is used in food packaging and single use non food products. Products must comply with the TÜV HOME compost standard. Logo and License number must be included where claim is made

Annex 2: Claims Not Permitted or Considered Misleading

This list is not exhaustive and any claim not listed here should be checked with Regulation, Policy & Compliance.

Misleading Claim	Why is this misleading?	Appropriate Claim (if applicable)
Planet-kind/friendly presents for eco enthusiasts	By claiming 'planet kind' products would need to be assured as being positive/neutral to the environment at all stages.	None.
We stock products made from more environmentally friendly materials, like BCI or recycled cotton	Use of 'environmentally friendly' is misleading	We stock products made from materials such as organic or recycled cotton. To find out more. [Claim must be made in accordance with that set out in Annex 1]
Sustainable fashion	Any type of fashion will require extraction of raw materials and manufacturing	None.
More sustainable farming	Any statement that emphasises a 'better' standard must be substantiated	
'Our fish are sustainable caught or sourced'	These statements are not permitted to be used when making a generic statement about all our fish.	Claims relating to specific species are permitted in Annex 1.
Every time you use our BeautyCycle scheme, you'll be helping us create these fun outdoor spaces for those who need it most	The scheme operates as mass balance which removes traceability of the specific products that JL customers are recycling through the BeautyCycle scheme	Everytime you use our BeautyCycle scheme you'll be helping us support our Playground Commitment. In partnership with a global recycling expert we are supporting the transformation of recycled plastic into the creation of new playgrounds.

Well-made and ethical clothes	Use of the word 'ethical' implies all stages of the supply chain have had an ethical audit with positive results	
'Product contains recycled viscose' Fabric composition is 20% recycled viscose, 40% viscose, 20% linen	This majority fibre is standard viscose so calling out recycled would lead the customer to think this referred to the majority of the fabric composition	See Annex I for qualification of 'Made Using Recycled Materials'
Sustainable Soya	Certified Sustainable or any similar claim as we do not currently have a policy in place that ensures that all our soya is certified sustainable	
'Our deliveries are carbon neutral'. When the company is offsetting emissions to make this claim.	Accurate information must be included on whether the company is actively reducing carbon emissions or are offsetting emissions.	We offset emissions from our deliveries by supporting [reforestation] projects in [location], as part of our commitment to reduce our environmental footprint
'For a better world' 'Good for the planet' 'Healthier planet'	Specific information must be provided as to how purchasing the product will achieve this.	
Images/pictures/logos which imply a product is better for the environment when it is not, e.g. picture of the world/globe, green, leaf	These create a false impression that the product has a positive impact on the environment or a less negative impact via the use of such images.	
Bamboo is inherently sustainable due to its fast growing nature	Stating 'inherently sustainable' due to one aspect of the product does not take account of the full lifecycle of the product and therefore cannot be substantiated.	
Rubberwood is inherently sustainable due to it being a by-product of the rubber industry		
With the exception of those detailed in Annex I, the following statements are prohibited in		

isolation. The use of these phrases may be permitted on a case by case basis if adequate substantiation is available. Please complete the [google form](#) for approval.

Environmentally friendly	Sustainable	Reduced carbon footprint
Recyclable	Greener	Eco
Biodegradable	Carbon neutral	Natural product

Document and Version Control

Amendments		
Version Number	Date	Detail
1	16th February 2022	New policy

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