

**Challenging and making  
environmental claims.**

**An Action Kit for  
The Ultimate Renewable™ Partners**

*Buy this and  
save forests*

*Better for  
the planet*

*Your sustainable choice*

*We'll claim  
anything to sell!*

*Environmentally  
friendly*

*Superior  
to wood*

**This kit contains information and advice for  
dealing with deceptive conduct and misleading  
representations about environmental matters and  
guidelines for making your own environmental claims.**

### **Disclaimer**

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# 1. Purpose of This Kit

This Kit will help you identify and act against misleading environmental claims which may be made to reduce the appeal of purchasing wood and wood products.

It will also help you make legitimate environmental claims about wood and wood products.

## 1.1 Scope

This Action Kit has been prepared for The Ultimate Renewable Partners to inform them and allow them to take action against non-wood competitors who are making misleading or deceptive statements in advertising and marketing materials. It has also been written to help The Ultimate Renewable Partners avoid unfair business practices and comply with the new Australian Consumer Law.

## 1.2 Background

FWPA has received requests from The Ultimate Renewable Partners highlighting misleading environmental claims by non-wood competitors and requesting action to respond to these misleading claims. The claims include examples of misleading environmental information about their products as well as misleading environmental claims about wood products.

The Ultimate Renewable Partners have also said that they would benefit from better understanding their obligations under legislation (and the various guidelines) as well as the opportunities and parameters for environmental marketing.

# 2. Overview

If a business manufactures, supplies or advertises products or services with statements about their environment credentials, sustainability, recycling, etc., or their impact on the environment, it is important to ensure that any claims are accurate and verifiable. Businesses who fail to do so, may breach the misleading and deceptive conduct and false representation provisions of **The Australian Consumer Law** and/or the **Environmental Claims in Advertising and Marketing Code**. Additionally, businesses may suffer commercially and risk reputational standing if their environmental claims are proven false.

## 3. Australian Consumer Law

The Australian Consumer Law (ACL) (previously known as the Trade Practices Act 1974 (TPA)) is a schedule to the Competition and Consumer Act 2010. Under the ACL businesses have the same obligations and responsibilities wherever they operate in Australia. Consumers also have the same protections and expectations about business conduct wherever they are in Australia.

The ACL is administered by the Australian Competition and Consumer Commission (the ACCC) and each State and Territory's consumer law agency and enforced by all Australian courts and tribunals.

The relevant sections of the ACL include the following:

### 3.1 Misleading or deceptive conduct

Under the ACL, it is unlawful for a business to engage in conduct that<sup>1</sup>:

- is misleading or deceptive
- would be likely to mislead or deceive

'Conduct' includes advertisements, promotions, quotations, statement or any representation by a person. Not disclosing relevant information, promises, opinions and predictions can also be misleading or deceptive.

Broadly speaking, conduct will be considered misleading if specific representations are inaccurate, or the overall impression conveyed is likely to mislead the people at whom it is directed.

*Australian Consumer Law (ACL) defines the responsibilities and obligations of businesses operating in Australia.*

### 3.2 False or misleading representations

Under the ACL, it is unlawful for a business to make false or misleading representations about goods or services. For instance, a business must not make a false or misleading statement about the standard, quality, value or grade of goods or services or the place of origin of a product.<sup>2</sup>

Making false or misleading representations is an offence with a maximum fine is \$500,000 for an individual and \$10 million for a corporate entity.

### 3.3 Misleading conduct – nature of goods and services

Businesses must not engage in conduct likely to mislead the public about the nature, manufacturing process, characteristics, and suitability for their purpose or the quantity of any goods or services.<sup>3</sup>

<sup>1</sup> See Sections 18 and 19 of the ACL for the legal text and Avoiding Unfair Business Practices for more guidance.

<sup>2</sup> See Sections 29-38 and Sections 151-160 of the ACL for the legal text and Avoiding Unfair Business Practices for more guidance.

<sup>3</sup> See Section 33 of the ACL for the legal text.

## 4. Australian Consumer Law and Environmental Claims

There are many groups, including environmental organisations, regularly monitoring the green claims being made by businesses. Accordingly, there is a high likelihood of being caught out if a business makes a false environmental claim. Compliance and enforcement of environmental claims comes within the ambit of the ACCC and other regulatory agencies. Recent cases demonstrate the ACCC's strong willingness to challenge companies on any misleading environmental claims, which intend to profit by advertising their product as 'beneficial for the environment', also known as 'Greenwashing'.<sup>4</sup>

### 4.1 Compliance

The ACCC aims to promote a high level of compliance with the law. Providing information and advice to consumers and traders for this purpose is a key function of ACL regulators. The ACCC is very good with helping industry comply with the ACL. They will attend industry meetings and seminars to explain the ACL and to promote compliance with the law.

The Ultimate Renewable Partners also have their own rights, individually or via their industry Associations, to take action against alleged breaches of the ACL.

### 4.2 Enforcement

When enforcing the law, ACL regulators such as the ACCC, seek to:

- stop the unlawful conduct
- undo the harm caused by the contravening conduct (for example, by corrective advertising or redress for those adversely affected)
- ensure future compliance with the law
- deter future offending conduct
- encourage the effective use of compliance systems
- when warranted, punish the wrongdoer with penalties or fines

ACL regulators will choose the most appropriate enforcement tools to achieve these outcomes in a timely and proportionate manner.

It should be noted that the ACL is consumer protection law. ACL regulators are setup up to protect consumers – not competitors from loss of market share.

*There are many people and organisations, including environmental organisations monitoring green claims and looking for examples of 'greenwashing'*

<sup>4</sup> <https://www.accc.gov.au/media-release/accc-appeals-decision-on-woolworths-disposable-picnic-products>

<https://www.accc.gov.au/media-release/accc-takes-action-against-volkswagen-over-diesel-emission-claims>

<https://www.accc.gov.au/media-release/pental-to-pay-700000-in-penalties-for-%E2%80%98flushable%E2%80%99-wipes-claims>

### 4.3 Enforcement Priorities

ACL regulators, such as the ACCC, give enforcement priority to matters that demonstrate one or more of the following:

- conduct of public interest or concern
- conduct resulting in significant consumer detriment
- conduct affecting disadvantaged or vulnerable consumer groups
- conduct that suggests a pattern of non-compliance by the trader or is indicative of a risk of future misconduct
- conduct involving a significant new or emerging market issue
- conduct that is industry-wide or likely to become so
- a significant impact on market integrity
- whether action is likely to have a worthwhile educative or deterrent effect
- conduct demonstrating a blatant disregard for the law

When appropriate, an ACL regulator may also pursue matters that test or clarify the law. The ACCC is less likely to pursue matters that:

- are one-off, isolated events
- are more appropriately resolved directly between the parties under an industry code (for example, by mediation or an industry dispute resolution body)
- involve issues more effectively dealt with by another agency, or
- are best dealt with between private parties (the ACL provides complainants with a private right of action in these circumstances)

As litigation is costly compared to other compliance and enforcement actions, where breaches are blatant, repeated and/or cause significant detriment, the regulator will target those traders for prosecution. ACL regulators have a range of other tools available, which may be used as an alternative to prosecution.

*ACL regulators have a range of enforcement options, some of which can be severe in the case of environmental claims.*

## 4.4 Environmental Claims - Enforcement Powers

The ACCC has the following enforcement powers when it comes to environmental claims:

- seek civil pecuniary penalties of up to \$10 million for certain contraventions of the ACL (these penalties do not apply to misleading or deceptive conduct)
- seek non-party redress for consumers who may have suffered loss due to a misleading environmental claim
- disqualify directors and managers for making misleading environmental claims;
- issue infringement notices, or on-the-spot fines, to businesses which have engaged in green-washing in breach of the ALC
- issue public warning notices, or name-and-shame notices, to alert consumers about traders which are engaging in conduct which the ACCC believes may be false or misleading

The ACCC also has the ability to refer a brief to the Commonwealth Director of Public Prosecutions if it believes that a criminal prosecution is warranted.

One important aspect of the civil liability regime is that it establishes a reverse onus of proof for representations about future matters. Therefore, if a business makes a representation about the future environmental benefits of a product, it may bear the onus of demonstrating that it had reasonable basis for making such a representation.

*Businesses may be required to bear the costs of providing proof that environmental claims they make are correct.*

## 4.5 Substantiation notices

The ACCC may issue businesses a substantiation notice requiring them to, among other things, supply information or documents capable of substantiating or supporting the claim or representation.

The period for compliance with a substantiation notice is 21 days, although the recipient of the notice may apply for an extension of time. Companies must comply with substantiation notices.

While the ACCC may issue substantiation notices in respect of any types of claims or representations they have noted that the “new substantiation powers” will particularly “assist in assessing green claims”<sup>5</sup>

<sup>5</sup>Consumer Protection: New Challenges and Opportunities”, Paper of Peter Kell, Deputy ACCC Chairman, for 2009 National Consumer Congress

## 5. Misleading Claims about Wood Products

When incorrect environmental information is presented about wood products by a non-wood competitor they are misleading a consumer of their products and thus are potentially in breach of the ACL. Some examples of potential breaches are included in this Kit (Part 8).

### 5.1 Using the Kit to make a complaint

This Kit will guide you through the steps, shown below, involved in making a complaint.

**1 Confirm that a false or misleading claim has been made**

*See pages 5-8 and 14 - 16 for Consumer Law details and examples*

**2 Send first letter**

*See Sample Letter 1, page 9*

**3 If claim is not withdrawn, send second letter**

*See Sample letter 2*

**4 If claim is not withdrawn, consult solicitor and send third letter**

*See Sample letter 3*

## 5.2 Using the Kit to check your own material

This Kit will guide you through the steps, shown below, involved in making a complaint.



### 5.3 Raising Concerns / Making a Complaint

As previously mentioned, The Ultimate Renewable Partners have their own rights, individually or via their industry associations, to take action against alleged breaches of the ACL. Any person who suffers loss or damage from contraventions of Sections 18 and 29 of the ACL, can take court proceedings and the court can grant injunctive relief and award damages for the loss or damage suffered.

The ACCC and other ACL regulators can also take action against the offending party. The ACCC, and other ACL regulators, take into account the nature of each complainant and assess each complaint on a case-by-case basis.

Establishing that the company has been made aware of the misleading conduct / false representations will improve the chances that the ACCC will take enforcement action.

Therefore, an initial letter (sample Letter #1) should be sent by as many companies and/or Industry Associations as possible citing the potential breaches of the ACL and giving the company notice that the offending materials should be reviewed.

If the offending material is not withdrawn, then a second letter (Sample Letter #2) should be sent by as many companies / Industry Associations to reiterate the complaint, emphasise potential breaches and definitely demand that the potentially offending material be removed.

A letter of concern from a legal practitioner will also carry more force than a letter from an Industry Association or a competitor company. If two letters do not result in any action, it is recommended that a legal practitioner be engaged to send a third letter (Sample Letter #3). This letter should be sent, with copies of previous correspondence to the offending company.

It is important to note, that any complaint should only be made strictly (and privately) towards the infringing party advertising the offending material. Any complaints received by any unrelated parties, could potentially be used as evidence for a counter-claim by the infringing party, on the basis that the complaint could itself be a misleading or deceptive representation in contravention of the ACL. Therefore, all communication should remain strictly confidential between the complainant and the infringing party.

### 5.4 Checking Your Own Materials

As previously mentioned, The Ultimate Renewable Partners have their own rights, individually or collectively. However, make sure that your own house is in order before you make a complaint. The subject of a complaint will often review your own statements and can choose to attack you for making allegedly misleading and deceptive claims in response to your complaint.

Similarly, the ACCC will not limit its enquiry to a situation that you have identified. They will often review related material and will just as willingly review your own material if the complainant suggests that your material is potentially misleading or deceptive.

## 6. Sample Warning Letters

### 6.1 Sample Warning Letter #1

*Dear Sir/Madam*

*RE: LETTER OF CONCERN*

*I am writing to raise concerns about claims your company has made in marketing literature that our company has seen on your website/promotional material. The promotional materials make a number of misleading and/or false claims about the environmental attributes of wood products.*

*In addition to the incorrect information about wood products, claims are made about the qualities of your product that, in our opinion, are false representations and potential breaches of Australian Consumer Law 2010 (ACL 2010).*

*I would also like to point out that the Australian Consumer and Competition Commission (ACCC) has recently been granted stronger powers of enforcement.*

*I request that you review your marketing materials, remove the offending claims and also undertake training of staff so that similar claims are not made in future.*

*We would appreciate that you inform us of the corrective actions that you have undertaken.*

*Yours sincerely,*

*XXXXXX XXXXXXXXXXXX  
Chief Executive  
XXXXXX XXXXXXXXXXXX*

## 6.1 Sample Warning Letter #2

Dear Sir/Madam

RE: LETTER OF COMPLAINT

I have previously written (fill in date of previous letter) to complain about misleading and/or false claims about wood products your company has made in marketing literature and what, in our opinion, are false representations about the quality of your products. As stated previously, in our opinion these are potential breaches of Australian Consumer Law 2010 (ACL 2010).

In this previous letter we requested that marketing materials be reviewed and the offending information and claims be removed.

I note that the offending material is still available.

I again request that you review your marketing materials and remove the offending claims immediately. We would appreciate that you inform us of the corrective actions that you have undertaken.

Yours sincerely,

XXXXXX XXXXXXXXXXXX  
Chief Executive  
X XXXXXXXXXXXX

## 6.1 Sample Warning Letter #3

NOTE: This letter could be sent by a legal advisor or from your company and would need to be tailored accordingly. If you do choose to copy in the ACCC you should enclose all previous correspondence together with samples of the offending material. In addition, if you have any material or additional arguments supporting your case that the claims are misleading and deceptive you should include them in a separate letter to the ACCC simply stating that you have communicated with the alleged offender but no action was taken and therefore you felt it necessary to contact the ACCC and hope that some action would be taken.

*Dear Sir/Madam*

*RE: COMPLAINT REFERRED TO ACCC*

*I write on behalf of XXXX XXXXXX of XXXXXXXXXXXXX who has written on two occasions (state date of two previous letters) to raise concerns about misleading claims regarding wood products your company has made in marketing literature. Concerns have also been raised that claims about the environmental attributes of your products are false and that these may potentially be breaches of Australian Consumer Law 2010 (ACL 2010).*

*Despite raising these concerns I note that the offending and potentially offending material is still available on the website/promotional literature.*

*Your inaction has left us no other option but to bring our concerns, and previous correspondence, to the attention of the Australian Competition and Consumer Commission (ACCC) who have a range of enforcement powers in these matters.*

*Yours sincerely,*

*XXXXXXXXXXXXXXXXXX  
Chief Solicitor  
X XXXXXXXXXXXXX*

*CC: Australian Consumer and Competition Commission*

## 7. Wood Products and Environmental Claims

The ACCC suggests that when making representations or claims that The Ultimate Renewable partners:

- be clear
- be specific
- be able to substantiate, and
- pay attention to the overall impression of the representations and claims that are made.

More detailed guidance is provided in the ACCC's document Green Marketing and the Australian Consumer Law that is included in this Kit.

In addition to this guidance, the main lessons to come out of a review of ACCC cases regarding environmental claims and investigations over the last few years are that businesses:

- have to make sure that the scientific evidence backs up the claim
- should be careful in their use of any images or pictures in any green advertising
- should avoid overstating the environmental benefits of a green initiative
- should avoid making green representations which are simply too confusing for consumers to understand
- should recognise that some environmental benefits are simply too complex to translate into a short and sharp marketing message
- should not misrepresent government policy or the government's administrative arrangements in relation to green issues
- should deliver on what they promise their consumers.

## 7.1 Potential ACL Breaches - Wood Examples

The following examples of environmental phrases or claims in the wood products industry that may be breaches of the ACL are provided below:

Phrase / Claim	Commentary
All our wood is legal and sustainable	<p>Claiming that all your wood products are from sustainably managed sources may be appropriate if 100% of your wood is from forests that are certified to a sustainable forest management standard (SFM) such as Responsible Wood or Forest Stewardship Council (FSC) and you have documentation that all your sites only purchase from such SFM certified forests. However, if your supplier provides mixed source certified wood only a proportion of wood is from SFM certified forests. In these circumstances the claim may be false.</p>
Our wood is from licensed and certified sources	<p>Vague and ambiguous thus has potential to mislead</p>
Environmentally friendly Climate friendly	<p>At best unhelpful and encourage scepticism; at worst potentially misleading.</p>
Carbon neutral	<p>Broadly speaking, carbon neutrality is achieved by reducing and offsetting a business' carbon dioxide equivalent (CO<sub>2</sub>-e) producing activities and requires comprehensive accounting of the carbon footprint.</p> <p>There are various recognised standards and emerging consensus of 'best practice' in the area that may help business account for and communicate the carbon footprint of their wood products. For example, the Carbon Offset Standard or PAS 2050.</p>
Carbon positive or carbon negative	<p>These two terms are being used interchangeably despite being opposites. Going beyond neutrality is a positive thing to do and in both cases the terms refer to sequestering more carbon dioxide than is emitted which many wood products, when measured across the harvest and manufacturing life cycles, do.</p> <p>As the point is that more CO<sub>2</sub> is removed from the atmosphere than is released during other manufacturing and transport processes, it probably makes sense to call it carbon negative. However the potential for confusion is obvious so it is best to avoid either term or, if either is used, add some further explanation of exactly what is meant.</p>
Low carbon footprint	<p>As for carbon neutral, claiming a low carbon footprint for a wood product requires that comprehensive accounting of the carbon footprint (in carbon dioxide equivalent (CO<sub>2</sub>-e)) using qualified practitioners and recognised standards. Recognised standards include the Australian Carbon Offset Standard (which requires the use of life cycle assessment methodology) or PAS 2050 <i>Specification for the assessment of the life cycle greenhouse gas emissions of goods and service.</i></p>

## 8. Potential ACL Breaches - Non Wood Examples

The following examples of environmental phrases or claims in the non-wood products industry that may be breaches of the ACL are provided below:

### Example 1 - Steel Framing Company

Claim	Potential ACL breach commentary
Steel possesses the highest strength to weight ratio of any building material being utilised today. It remains one of the strongest, most durable and economically manufactured materials.	Potentially false representations.
Steel will not warp, rot, split, crack or creep.	Potentially false representation.
Dimensionally stable - does not expand or contract.	Potentially false representation.
Steel is the most recycled material on planet! You can frame a typical home with 6 recycled cars...or take down 40-50 trees!	Potentially misleading. This statement is based on US data that is not relevant to Australia.
Less waste - 2% in steel verses 20% in wood construction	Potentially misleading. This statement is based on US data that is not relevant to Australia.

## Example 2 - Aluminium Products Company

Claim	Potential ACL breach commentary
Sustainable [aluminium product name]	Potentially misleading
While cedar products add to the destruction of forests, require regular painting and need replacing more often than timber, [aluminium product name] provides solutions for the environmental disadvantages of using timber.	In these circumstances the claim may be false.
No harmful greenhouse gases	<p>In these circumstances the claim may be false.</p> <p>CO<sub>2</sub> is the biggest greenhouse gas. The aluminium industry is a very large user of electricity. In countries such as Australia, the electricity is mainly generated by combustion of coal, which emits large quantities of CO<sub>2</sub>.</p>
Aluminium is stronger and more durable than timber, so products such as windows and doors will last longer.	In these circumstances the representation may be false
	In some circumstances images may falsely represent a product's qualities. This image in particular suggests that, by using [aluminium product name] instead of western red cedar, one is saving tropical forests from destruction. Western red cedar is not sourced from tropical forests.
Aluminium has the added advantage of only requiring a small amount of energy in the recycling process.	Potentially misleading. Recycling aluminium uses energy that emits greenhouse gases.
Friendly to our environment	Potentially misleading

### Example 3 - Steel Framing Company

Claim	Potential ACL breach commentary
Environmentally friendly	Potentially misleading
Steel possesses the highest strength-to-weight ratio of any building material (including timber and block).	In these circumstances may be false. "Any" building material covers all building materials.
It takes approximately a quarter acre of mature trees to produce the wood framing for a typical house. The same house can be steel framed from three or four old cars.	In these circumstances may be misleading. This information is based on US data that may not be relevant to Australia.
Almost half the world's steel production now takes place in electric plants that operate exclusively with recycled scrap and generate no CO <sub>2</sub> emissions.	In these circumstances may be a false or misleading representation. CO <sub>2</sub> is still likely to be emitted from the generation of electricity.
Debris from a typical wood framed home accounts for 1.4 m <sup>3</sup> of landfill waste, compared to only 0.1m <sup>3</sup> from a steel framed house.	In these circumstances may be misleading. This information is based on US data that may not be relevant to Australia.
The war against termites once relied on organochloride pesticides, which have since been banned. This has been replaced by new chemical treatments that must be renewed at least every 4 years to remain effective.	In these circumstances may be misleading. The last sentence looks as if it is based on US data not relevant to Australia. The preservatives used in termite resistant timber framing do not require renewal every 4 years.
The steel in steel framed home is chemical-free.	In these circumstances may be a false or misleading representation. All substances, including steel, are composed of chemicals.

## 9. Environmental Claims in Advertising and Marketing Code

Environmental or green claims made in advertising and marketing material may also be covered by the Australian Association of National Advertisers' (AANA) Environmental Claims in Advertising and Market Code. The Code emphasizes that claims should be:

- Truthful and factual
- Relevant to the product or service and its actual environmental impacts
- Substantiated and verifiable.

The AANA have released a Practice note to assist in interpreting the Code.

Complaints about breaches of the Code are adjudicated by the Advertising Standards Board (ASB). The ASB can request that a business remove or amend any marketing material found to be in breach of the Code.

# 10. Key Documents

## Australian Consumer Law Resources

### ***Avoiding unfair business practices guide: A guide for businesses and legal practitioners*** –

covers misleading or deceptive conduct, unconscionable conduct, false or misleading representations and related offences, information standards and country of origin representations.

Available at <https://www.accc.gov.au/publications/avoiding-unfair-business-practices-a-guide-for-businesses-legal-practitioners>

### ***Compliance and Enforcement Guide*** – sets out the compliance and enforcement approach

of the ACL regulators (ACCC, ASIC and the State and Territory consumer protection agencies).

Available at <https://www.accc.gov.au/publications/compliance-enforcement>

### ***ACCC Compliance and Enforcement Policy and Priorities*** – sets out the principles adopted by the ACCC to achieve compliance with the law, and outlines the ACCC's enforcement powers, functions, priorities and strategies.

Available at <https://www.accc.gov.au/publications/2019-compliance-and-enforcement-priorities>

## Australian Competition and Consumer Commission (ACCC)

***Carbon claims and the Australian Consumer Law*** – a guide to inform businesses about their obligations under the Australian Consumer Law (ACL). It is intended to inform both businesses that are providers of offsets, and businesses that promote their green credentials using purchased carbon offsets. The ACCC carbon guidance was to be updated on the introduction of a Carbon Pollution Reduction Scheme (CPRS) however as this has now been delayed the ACCC is assessing what changes to its guidance may be required.

Available at <http://www.accc.gov.au/content/index.phtml/itemId/833279>

***Green Marketing and the Australian Consumer Law*** – a guide to assist manufacturers, suppliers, advertisers and others to assess the strength of any environmental claims they make and to improve the accuracy and usefulness to consumers of their labelling, packaging and advertising.

Available at <https://www.accc.gov.au/publications/green-marketing-and-the-australian-consumer-law>

***Your consumer rights: environmental claims, fact sheet*** – discusses some of the common environmental claims that are made, possible breaches of the Australian Consumer Law (ACL), by businesses making environmental claims and the role of the ACCC regarding breaches of the Act.

Available at <https://www.accc.gov.au/publications/your-consumer-rights-environmental-claims>

### **Australian Association of National Advertisers (AANA)**

***Environmental Claims in Advertising and Marketing Code*** – an advertising industry code developed to ensure that advertisers and marketers develop and maintain rigorous standards when making Environmental Claims and to increase consumer confidence to the benefit of the environment, consumers and industry. Available at <http://aana.com.au/content/uploads/2018/03/180316-Environmental-Claims-Code.pdf>

***Environmental Claims in Advertising and Marketing Code: Practice Note*** – further clarifies a number of terms encompassed by the Code including “Environment”, “Environmental Aspect” and “Environmental Claims”. Also provides clause by clause guidance and examples to assist advertisers and marketers to interpret and adhere to the Code. The Practice Note will guide the Advertising Standards Board in adjudicating complaints under the Code. Available at <http://aana.com.au/content/uploads/2018/03/180316-Environmental-Claims-Code-Practice-Note.pdf>

### **Australian Standards**

***Environmental labels and declarations— Self-declared environmental claims (Type II environmental labelling) AS/NZS ISO 14021: 2018*** –provides some practical guidance on the types of claims which businesses should be careful using or avoids altogether. Available for purchase at [https://infostore.saiglobal.com/en-au/Standards/AS-14021-2018-1131876\\_SAIG\\_AS\\_AS\\_2627183/](https://infostore.saiglobal.com/en-au/Standards/AS-14021-2018-1131876_SAIG_AS_AS_2627183/)