

Attachment-7

Green Marketing Pledge

GOAL

The Pledge seeks to accelerate the adoption of sound green product practices, garner the widest possible awareness of the FTC's Environmental Marketing Guides and other similarly relevant environmental marketing guidance documents, and help organizations to publically display continuing commitments to the delivery, purchase and use of green products and services. Specifically, the Green Products Roundtable (GPR) seeks to enroll 100 additional signatories by December 31, 2012.

BACKGROUND

From its inception an ongoing theme in GPR discussions has been a desire to bring high level collaborative leadership to the green products and marketing space. Dimensions of this include both minimal practices (a floor) and aspirational goals (a high bar), understanding that these are both likely to rise further over the next decade as the science of green improves.

The idea of the Pledge is simple. GPR wants to accelerate the use of existing voluntary and credible standards of practice. Through the Pledge, signatories make a moral commitment to follow the appropriate standards for green marketing claims. Signing the Pledge is an indication of corporate and organizational commitment to referenced ideas about "green." However, signatories are encouraged to go beyond these minimum standards. The Keystone Center will administer and maintain the Pledge system, hold the pledges and their renewals, and help publicize them until an independent authoritative successor body emerges later in 2011.

TASKS AND TIMETABLE

- Finalize the Pledge (*by March 2011*)
- Develop a website (or portion of the GPR website) to explain the Pledge and display the names and trust marks or logos of signatories. (*by March 2011*)
- Develop a final organization and program structure that will support the Pledge. (*by March 2011*)
- Identify best mechanism(s) for distribution of the GPR Pledge and the bringing of national and international attention to this initiative. (*by March 2011*)
- Prepare and disseminate a press release announcing the Pledge, identifying the initial signatories, and inviting others to become initial signers. (*by March 2011*)
- Contact non-GPR companies and organizations to see if they are willing to be Initial Signatories (*by March 2011*)

FAQ's FOR PROSPECTIVE SIGNATORIES

What is the Pledge?

A voluntary, public, and signed commitment to adhere to appropriate standards or practices, as described later.

Who is sponsoring it?

The Green Products Roundtable (GPR), a 35 member ongoing collaborative convened and facilitated by The Keystone Center. The GPR is composed of corporations, NGOs, institutional purchasers and other experts on the greening marketplace (see <http://www.keystone.org/spp/environment/sustainability>).

What are the benefits to signatories?

The Pledge benefits signatories in the following ways:

- It signals a desire and willingness to be identified as a progressive entity committed to honesty and transparency in the use of environmental marketing claims.
- It creates an instant networking tool to connect with other like-minded organizations.
- It is a vehicle to publicize the commitments made by a signatory;
- It will bring further communications from the GPR on major policy initiatives that are underway and a special invitation to annual events for corporations, NGOs, purchasers, certifiers, standard setters, and others.

What about substantiation?

Signatories must be able to substantiate their claims when made. Disclosure is a much more complex matter, which the GPR has under discussion. To facilitate information sharing, the GPR website will provide an opportunity for signatories to voluntarily post their third-party certifications, technical or scientific information, and other non-proprietary examples of substantiation or provide a URL link to their own websites where such materials are made available.

Are signatories required to divulge business proprietary information?

No.

Are signatories required to subscribe to a particular set of standards or labels?

No. The Pledge is voluntary. However, by signing the Pledge you are stating that your organization's intention that its environmental marketing materials or product or service claims will be consistent with one or more relevant guidelines and standards, for example:

- U.S. Federal Trade Commission's (FTC's) *Guides for the Use of Environmental Marketing Claims*; and/or
- Canadian Competition Bureau guidance *PLUS 14021 Environmental claims: A guide for industry and advertisers*; and/or

- United Kingdom's Department for Environment, Food, and Rural Affairs (DEFRA) *Green Claims – Practical Guidance How to Make a Good Environmental Claim*; and/or
- International Consumer Protection and Enforcement Network (ICPEN) Green Claims Working Group's, *Reference Document for the Development of Environmental Marketing Claim Guides*; and/or
- The European Commission's *Guidelines for the Assessment of Environmental Claims*; and/or
- Australian Competition and Consumer Commission's *Green Marketing and the Trade Practices Act* and/or
- International Organization for Standardization (ISO)'s *ISO Standard 14021: Environmental Labels and Declarations - Self-Declared Environmental Claims* Guidance or *ISO Standard 14025: Type III Environmental Labels and Declarations – Environmental Product Declarations*.

Are there any legal liabilities to signing?

No. The Pledge is not intended to impose judicially enforceable rights or obligations, nor does it constitute a waiver of any substantive or procedural rights or obligations. Rather, the Pledge, similar to "Corporate Responsibility Statements" and other high level organizational commitments, is a voluntary declaration aimed at encouraging participation, understanding and compliance with environmental marketing requirements.

Is there a fee?

Yes. A modest annual fee of \$175.00/year commencing on the date of signing will be required to help administer the program.

What happens after an organization signs?

Two things. First, the organization's commitment will be posted to the GPR's website. Secondly, the organization's commitment will be announced to the GPR's membership, and the organizational representative(s) will be added to the GPR list serve. The Keystone Center, on behalf of The GPR, will perform the logistics around upkeep and monitoring of the list serve and other relevant information.

Is the Pledge for perpetuity?

No. The Pledge is annually renewable and the Pledge itself will be reviewed each year to keep up with the emerging science and policy of green marketing and product claims. As "state-of-the-art" changes, so will the Pledge and the documents it references and uses as the basis of the public commitment organizations are asked to make.

Who will be responsible for reviewing and revising the Pledge annually?

The GPR or its successor entity will be responsible for the review of and revisions to the Pledge. GPR or its successor will annually review the Pledge and, if required, prepare possible revisions. Comments from all signatories, the GPR, and other experts will be invited prior to making changes.

Who will be responsible for ensuring that signatories follow through with their commitment?

The GPR or its successor will bear this responsibility. We do not anticipate complaints but it is conceivable they could arise. When and if a complaint arises, the GPR or its successor will first encourage in-

formal communication between the complainant and the specific organization to resolve the matter. Where that is not possible, the complainant is free to file a complaint to the Federal Trade Commission (FTC), the National Advertising Division (NAD) of the Better Business Bureau (BBB) or to any other relevant legal authority. If the signatory is found to be out of compliance through this means, and the GPR is so notified, the signatory will be removed from the list until they are in compliance.

Will companies be able to voluntarily remove themselves as signatories of the GPR Pledge if necessary?

While it is hoped that signatories remain committed to the Pledge once they sign, it is a voluntary commitment and signatories may remove their names if they deem it necessary. If a request to remove the company name is made by the signatory to GPR, the company name will simply be removed from the online list of signatories by GPR.

Will the GPR continue to be the operating entity?

Discussions are underway in the GPR about the creation of a new, knowledgeable, and independent entity that could be the successor body for some of the GPR's activities, including this Pledge.

Who do I contact for more information or to enroll on the list of organizations making a pledge?

Ms. Suzan Klein, Associate
The Keystone Center
Tel: 202-452-1591

Green Marketing Pledge

Month, day, 2011 – Month, day, 2012

(posted organization logo if desired)

Organization Name _____

joins with other signatories advocating honesty and transparency in the use of environmental marketing claims. We believe that the public needs accurate, relevant, and verifiable information on which to make purchasing decisions about our companies and products/services. We commit to use environmental marketing materials and product or service claims that are consistent with one or more applicable guidelines, for example:

- U.S. Federal Trade Commission's (FTC's) *Guides for the Use of Environmental Marketing Claims*; and/or
- Canadian Competition Bureau guidance *PLUS 14021 Environmental claims: A guide for industry and advertisers*; and/or
- United Kingdom's Department for Environment, Food, and Rural Affairs (DEFRA) *Green Claims – Practical Guidance How to Make a Good Environmental Claim*; and/or
- International Consumer Protection and Enforcement Network (ICPEN) Green Claims Working Group's, *Reference Document for the Development of Environmental Marketing Claim Guides*; and/or
- The European Commission's *Guidelines for the Assessment of Environmental Claims*; and/or
- Australian Competition and Consumer Commission's *Green Marketing and the Trade Practices Act* document; and/or
- International Organization for Standardization (ISO)'s *ISO Standard 14021: Environmental Labels and Declarations - Self-Declared Environmental Claims* Guidance or *ISO Standard 14025: Type III Environmental Labels and Declarations – Environmental Product Declarations*.

(Signature)

(Printed Name)

(Title)

(Organization)

(Date)