

Consumption Research Norway's feedback on the proposal for a directive on substantiation and communication of explicit environmental claims

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Introduction

Consumption Research Norway (SIFO) is a non-profit, transdisciplinary research institute at the Oslo Metropolitan University. Our research aims to understand the role of consumption and consumers in society and to provide the knowledge basis for public consumer policies.

In this feedback document, we build on our research concerning greenwashing seen from a consumer perspective along with more specific knowledge of clothing and textiles and the challenges that the industry and authorities are facing in the development of tools to compare the environmental impacts of textiles. Even though “[t]he European Green Deal sets out to empower consumers to the green transition» - and this proposed directive will make “consumers make more sustainable decisions”, we see that there is a danger that the industry’s interest in continuing green marketing will be prioritised over environmental and consumer interests. We, therefore, emphasise that the directive actively addresses that **green claims must be significant, verifiable, relevant, and understandable for consumers** and that **knowledge of consumption and consumer interests is taken seriously in the development of the directive**. We would like to remind that we are all together the most important stakeholders – as consumers and also as citizens because the welfare of tomorrow depends on a rapid reduction of climate and other environmental impacts. In the following, we will point out some areas where consumer interests and environmental considerations can be strengthened.

Green marketing also increases consumption

We would like to warn against assigning too much of the responsibility for change to the consumer via green marketing. The reason for this is that the consumer does not necessarily have the knowledge, time or interest in taking this responsibility. In a Norwegian study of greenwashing, the consumers often expressed bewilderment towards having to choose between products that are sustainable and those that are not: “Why can’t all products just be sustainable?” [1]. The consumers welcomed stringent state control of unwanted products.

Marketing is a tool to sell more. The issue with clothing and textiles is that much more is sold than what EU/EEA citizens can wear. Therefore, large quantities of used and unused but usable clothes, are exported from the EU/EEA, as from other wealthy nations. Reducing environmental impacts would primarily mean reducing imports and production of clothing and other textiles. Green marketing, on the other hand, is done with the intention of increasing sales of the item claimed to be greener. For clothing, this will increase environmental impacts in two ways: Firstly, marketing using green argumentation will make it easier to buy more: the resistance against buying something is lower when the product is “green”. This argument is valid for a vast range of products where the choice is not between two products but between buying or not buying something new. The second argument is more specific to clothing. For many people, it is difficult to find clothing that fits. This is due to both complex dress norms (particularly for womenswear) and that the industry is more

directed towards images of new clothes than how the clothes perform practically, among other things through poor size labelling and fit. The best clothing purchase would be the one that activates the largest possible proportion of the already existing wardrobe, and that will suit the wearer's taste and body over a long period of time and for a variety of occasions. It is difficult enough for many people to find such clothes. Adding another element to the decision (based on claims of lower environmental impacts) will inevitably lower the priority of other important parameters in the decision-making process. As far as we know, neither the extent of the additional load created by green marketing nor the differences in impacts between products are studied for textiles. For green marketing to reduce environmental impacts, the additional load from increased sales must be smaller than the environmental benefits from the difference in impacts.

We, therefore, recommend that green marketing is allowed only when products have a *significantly* lower environmental impact than other products and that both negative and positive effects of green marketing are examined.

Significant improvements

This point follows from the previous. We need a definition of how much better a product needs to be to be marketed as greener. Or put differently: what is "truly better for the environment"?

Today the industry often uses fibre as the basis for green claims. It is disputable whether improvements on something that makes up only 12-16.3% of a textile product's lifecycle impact [2, 3], are large enough to warrant such marketing. Another issue is whether what we are seeing consists of actual improvements, and reductions in environmental impacts, e.g., water and land use by switching to fossil materials – considering the problems that plastics represent and that we will discuss in the following. A truly "better for the environment" can hardly be substituting products with others that are better in some ways and worse in others, of which the transition from natural fibres to plastics is a good example.

We, therefore, recommend clearly defining what significant improvements mean.

More plastic is not a viable environmental strategy

Norwegian consumers consider natural materials to be better both environmentally and health-wise than textiles made of fossil raw materials [4]. The way LCAs for textiles are devised, the specific plastic issues are not accounted for, and the systems are unsuitable for comparing natural and synthetic textiles. This concerns commercial and political instruments for comparing textiles such as the Higg MSI and the PEFCR [5]. In addition, a number of other suggestions that favour plastic have been made, such as:

- The use of weight and not the garment (item) as a unit (when plastic is significantly lighter)
- The use of durability (physical strength) and not lifetime as measuring unit for longevity (when plastics are significantly stronger but not used for longer)

We, therefore, recommend that the Commission considers whether its proposals promote fossil materials, and whether green marketing of fossil materials over natural materials is in the interest of the consumers and the environment.

Comparable information about products

Both the development of the PEFCR for textiles and the Norwegian Consumer Authority (NCA)'s critique of the use of the Higg MSI in marketing [6] show that both methods and data are lacking to map and compare "the sustainability, durability and carbon footprint of the products". There are so

far several significant issues concerning the existing data, such as the above-mentioned absence of impacts related to fossil materials, but also concerning comparable, updated and reliable data on a product-specific and detailed production level. A fundamental issue is the poorly developed understanding of the functional unit in the LCAs, meaning the unit that is to be analysed. In practice, this means that unsold or single-use products are compared to products that are used for generations. We see that the industry wants strength to be the measurement for lifetime, a suggestion that favours fast fashion and fossil materials (because they are the strongest). We believe that a comparison that does not include the use phase does not give reliable and comparable information. The use phase should be studied through actual use (lifetime) and priority should not be given based on undocumented ideas of stronger clothing being used more. This can be done through studies of consumption, e.g., in line with our suggestion for targeted producer responsibility (TPR) or wardrobe studies [7, 8, 9].

We discourage the use of PEF and other LCA-based tools for comparison of textile products before they in an empirically based, scientific manner, take lifetime (the use phase) into account, e.g., through TPR [7,8].

Reliable information about products

Consumers have little trust in the industry and more in authorities [1]. We see an increasing number of organisations that propose environmental services, labelling schemes, certificates, etc. These can have independent economic interests and/or be offspring of the industry's own organisations and multinational coalitions. When they are subject to critique, they can change names. We write this because it is not always easy to ascertain who the third party is, and who can, legitimately, verify the information. Invented and often also debunked "facts" continue to flourish, also cited by sources that are recognised for their reliability. This leads to authorities also losing trustworthiness and it will require extensive work to rectify this. The work against greenwashing will only be effective once the stream of misinformation is halted.

We would, furthermore, ask that the information provided by the industry (including its various investigative organisations and consultants) is not automatically considered factual, but that it is verified against independent sources and research. This includes that it satisfies the criteria for comparative LCAs, using the same system boundaries and functional units, and that data used is representative of technologies, times and places in all production phases.

Relevant information

To be relevant, the information must be specific to the product that is marketed with green claims. For products such as clothing, where and how it is produced has a greater impact on the environment than what it is made of. Therefore, global averages do not make sense in this case. Information based on global averages is not relevant for the consumer because it does not say anything about the item they are holding in their hand. For lifetime, brand-specific numbers (from TPR) can be used because it is impossible to get product-specific numbers given the short amount of time most clothing and textiles stay on the market.

We would therefore ask that global averages and other secondary information are used only where it is documented that they are representative and appropriate for the given product or producer.

To conclude

In summary, we would like the consumers' right to protection against greenwashing to weigh heavier than the industry's wish to market its products as green. This can be done by placing the bar for what

entails greenwashing low. Furthermore, we believe that single-use products are incomparable to products used over generations and recommend that lifetime analyses are done, as opposed to focusing on durability and other plastic-promoting suggestions. In other words, we wish for clear and strict definitions of what environmental improvements consist of, reliable and relevant information, and that the rapid plastification of several product groups (including textiles) is not further promoted through environmental regulations.

References

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