Legislative proposal on substantiating green claims

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 the society, and to provide the knowledge basis for public consumer policies.

Based on the current status, as seen from the field of consumption studies, we agree with the identified need to create more clarity within a very confusing area of legislation and labelling. However, it is paradoxical that reducing complexity is often met with a desire to introduce new schemes or strengthen existing schemes, such as in the area of product labelling.

Specific objectives in the proposal include moving to a more harmonized approach for providing reliable environmental information, increasing simplification and reduction of administrative burdens. Such harmonization is undoubtedly desirable. However, the knowledge base for understanding environmental impact is in constant change also involving disagreement. Such knowledge gaps can have significant effect, so caution is recommended before requiring compulsory adoption of PEF methodology for substantiating green claims. Premature adoption could risk criticism that PEF is unintentionally contributing to the problem of greenwashing. A unification might therefore be unable to account for the increase in knowledge and the diversity of perspectives within the field. Two examples from the field of textiles demonstrate this point.

1) Microplastics

For several years, there has been active work to develop good comparison tools for textiles, by the industry itself such as the Higg Index developed by the Sustainable Apparel Coalition (SAC)[1] and now also within the EU Product Environmental Footprint (PEF). Simultaneously with this work, knowledge about microplastic pollution of air, soil and sea has increased[2]. Over 60% of global textile fibre production is synthetic (plastic) and washing of textiles is an important contributor to microplastic pollution of the sea. As of today, no LCAs or labelling schemes of textiles address the plastic problem. As far as we know, there are no plans to take this into account in the PEFCRs or the new criteria document for the Nordic Ecolabel - or other eco-labels such as the EU Ecolabel. For example, synthetic textiles, and in particular so-called "recycled polyester", a fibre made mainly from PET bottles, on the other hand, get a high, that is, "green" score in many of the comparison tools.

We think this is problematic. It is quite clear that synthetic fibre (plastic / microplastic) pollution is a new major environmental problem. Developing a system that will dominate communication around environmental impact and that does not address plastic as a problem will hardly be in line with a general understanding of environmental problems. There is thus a danger that the comparison system will also be accused of greenwashing by hiding important environmental impacts on the products. This may be especially valid for textiles, because we know that most consumers are not able to recognize plastic in the form of textiles. In other words, they do not know what they are buying. Therefore, it is of utmost importance that if labelling schemes and comparison tools are to be

[1] https://apparelcoalition.org/
[2] Henry, B., K. Laitala, and I. G. Klepp. 2019. Microfibres from apparel and home textiles: Prospects for including microplastics in environmental sustainability assessment. *Science of The Total Environment* 652: 483-494. https://doi.org/10.1016/j.scitotenv.2018.10.166.

developed without taking into account the spread of plastic and microplastic, requirements should be introduced for clearer labelling that the product contains plastic and to what extent it contributes to the spread of microplastic.

2) Renewable raw materials

Another example is the way renewable raw materials are treated in LCA methodology (and hence PEF) resulting in an implicit bias. Typically, LCAs for renewable agricultural production show high negative impacts for land use (i.e. the farm), whereas sourcing fossil fuel involves minimal land use (i.e. for oil drilling rig), water consumption and GHG emissions. But the use of non-renewable materials is a problem in itself. On the other hand, "land use" like grazing can foster biodiversity and be climate neutral or even positive.

Labelling schemes depend on trust

On a more general level, we believe this issue raises a question about how disagreements and (relatively) new knowledge should be handled. Labelling schemes also depend on trust. We are best acquainted with Norwegian consumers, although we have also conducted global studies. Environmental ranking tools that show that plastic textiles are "green" and wool is "red" - to put it simply: most people will not believe it. By leaving much of the work to the industry itself, those with strongest economic backing and interests will easily dominate the process and win. This can be at the expense of the scheme's environmental focus and credibility.

Since the environmental claims will be based on one set of tools (PEFCR), the tools become very important and there should be an open process for developing and revising them based on new knowledge on the field. This includes aspects such as how the relative importance of the different environmental impacts should be accounted for. Another regulation that could be used here is REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals). Information about hazardous chemicals should be made readily available.