

A recent story in the New York Times reported that the F.T.C. has not updated its environmental advertising guidelines, known as the Green Guides, since 1998. Back then, the agency did not create definitions for phrases that are common now — like renewable energy, carbon offsets and sustainability. As the FTC continues to study ‘green’ marketing messages and to develop guidelines to address such messages, we encourage them to address the following issues.

1. Define the key phrases noted by the New York Times, but less technical terminology such as ‘green’, ‘clean’ and ‘earth friendly’. These simple words may be loaded with value in peoples’ minds, but may not accurately represent what true product attributes. For example, an ad was uploaded to the Greenwashing Index site for a sunblock that was ‘gentle to the earth’. Investigation of the product found that it was oil free. While sunblocks with oil are damaging to the environment, sunblockcs without oil are arguably neither good nor bad for the earth. So the phrase ‘gentle to the earth’ may overstate the value of the product in consumers’ minds.
2. Insist that marketers with green messages provide context to allow consumers to evaluate the message. For example, an ad for BP stated a high tonnage number of reduced emissions. Without a context of total emissions reduced, this information is meaningless. Think of it this way. If one cola company said that 500 consumers preferred their cola compared to a competitor, the statement would be meaningless without an idea of the size of the sample studied. If the cola was preferred by 500 out of 550 consumers, that’s persuasive. If it was preferred by 500 out of 10,000, not so much.
3. Suggest that marketers refrain from speculation of the benefits that some of their ‘earth friendly’ practices might provide. For example, a company could state that their business practices might reduce the carbon footprint significantly. That’s just like saying a detergent might do a great job of cleaning your clothes. The word ‘might’ can

easily be interpreted as 'will' in consumers' minds, again overstating the green value of the company.

4. Mandate that any company that encourages consumers to adopt earth friendly behaviors in its messages while stating that the company is also doing its part be required to, at a minimum, post a link to a web page outlining their green business practices so consumers can see for themselves whether the company is acting in a green manner.