SPICE

SUSTAINABLE PACKAGING INITIATIVE FOR COSMETICS

COSMETICS PACKAGING CLAIMS GUIDELINES

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Co-founded by L'ORÉAL & Quantis

CONTENT

WHAT IS SPICE?

Packaging is a key lever to act on sustainability. Yet cosmetics companies face considerable **methodological challenges when measuring, tracking progress and communicating** on the environmental footprint of their packaging. **SPICE develops the solutions to overcome these challenges.**

In May 2018, L'Oréal and Quantis launched SPICE, **S**ustainable **P**ackaging **I**nitiative for **C**osm**E**tics, a pre-competitive initiative that now includes **24 global cosmetics brands and organizations** along the packaging value chain. Together, SPICE members co-create methodologies and tools to **drive the future of sustainable packaging for cosmetics.**

The Cosmetics Packaging Claims Guidelines rely on the SPICE Methodological Guidelines for carrying out quantified environmental packaging assessments in the cosmetics industry.

Access the Methodological Guidelines:
https://open-spice.com/spice-guidelines/

Access more information about SPICE:
https://open-spice.com

PURPOSE

Sustainable packaging is an essential proof-point that underpins a product's positioning. Accurately communicating packaging environmental attributes can strengthen the positive perception of cosmetic brands.

These guidelines have dual objectives:

1. Establish the minimum requirements and strong recommendations for providing credible packaging sustainability information to consumers and other audiences

2. Encourage the development of more sustainable packaging through the desire to make stronger claims

SCOPE

The document takes a sectorial approach that is not brand-specific. All proposed packaging claims follow the ISO 14021:2016 principles on self-declared environmental claims, ISO LCA guidelines ISO 14044:2006 and general principles on environmental declarations and labels ISO 14020:2000.

This document focuses only on environmental packaging claims in the cosmetic sector.

Out of scope:

Product ingredient-related claims (including sustainable sourcing of raw materials used to make the cosmetic product itself).

Social claims about the packaging materials, assembly, distribution, etc. (e.g. working conditions in factories where packages are made).

Claims on general packaging raw materials properties (e.g. glass, cardboard or aluminum material properties).

USE

This document is primarily addressed to companies' internal teams, including marketing and brand communications, sales, corporate communications, R&D, packaging, legal, and regulatory departments.

Claims can be made either **on-pack** or **offpack** (e.g. in websites, social media, stores, press releases). It is up to brands to decide which channel is best to use (on or off-pack) to convey a claim in the most impactful way to end-consumers.

It is recommended to always check with relevant internal local business partners, as risks and rules may vary by country.

CONSUMERS CARE ABOUT PRODUCT SUSTAINABILITY ATTRIBUTES...

AWARENESS OF SUSTAINABILITY ISSUES HAS ADVANCED.

Some of the specific sustainability concerns consumers care about:

- OCEANS & PLASTICS
- GLOBAL WARMING
- ANIMAL TESTING
- CHEMICALS
- RECYCLING
- FAIR TRADE

Source: CGF and Futerra x Savanta October 2019. Online community; 66 participants over 3 days. Online survey; 6085 respondents. Aged 16-54. In USA, Brazil, France, Germany, China and Japan.

68%* of **US consumers** say they are more conscious of packaging materials and design today than they were 5 years ago

83%* of consumers believe it is important or extremely important for companies to design products that are meant to be reused or recycled.

Sources:

*Accenture survey, April 2019, 6,000 respondents in 11 countries across North America, Europe and Asia.

...AND ARE ASKING BRANDS TO TALK ABOUT IT HONESTLY AND TRANSPARENTLY.

94%	There is a need for more honesty and transparency from brands on their product ingredients
92%	I consider the impact the products I buy might have on my health
89%	Brands should actively be talking about whether their products are sustainable and ethical
85%	I consider the impact the products I buy might have on the planet
75%	I like to try out small or independent brands
72%	I have changed my buying habits in the last 2-3 years to be more ethically and sustainability conscious
47%	Big brands are more sustainable than smaller or independent ones

Source: CGF and Futerra x Savanta October 2019. Online community; 66 participants over 3 days. Online survey; 6085 respondents. Aged 16-54. In USA, Brazil, France, Germany, China and Japan.

GENERAL COMMUNICATION GUIDANCE

I. CRITERIA TO FOLLOW

1. SPECIFIC

Claims should be specific, complete and accurate. Product Life Cycle Assessments can help substantiate claims.

2. MEASURABLE

Claims should be substantiated and verified. Third-party reviews are mandatory when making comparisons.

3. RELEVANT

Relate important benefits in areas aligned with brand purpose.

4. UNDERSTANDABLE

Make sure information is understandable. Avoid jargon and technical language.

5. ACCESSIBLE

Ensure that all relevant information and sources are available.

Responsibility for clarity lies in the hands of the business making the claim.

NOTE: Be careful when using generic illustrations, symbols, and color codes as they may be misunderstood. The use of specific third-party approved labels and claims is recommended. Any newly created symbols deemed necessary should comply with ISO 9186 (procedures for the development and testing of public information on symbols).

II. USE OF LIFE CYCLE ASSESSMENT FOR MAKING CLAIMS

1. SPICE Methodological Guidelines are **based on a Life Cycle Assessment (LCA) approach**; therefore LCA communication guidelines apply.
2. Packaging made from different materials can be compared **only if the packaging delivers the same user value** (same usage characteristics) for the product.
3. When comparing a brand's own products within the brand's portfolio, or when comparing two versions of the same product, communications should follow the general communication guidance outlined in this document based on ISO 14 021-2016 standard.
4. ISO 14 044 prohibits comparative claims using a consolidated overall footprint score. In other words, it is not allowed to use a single score to make a comparative claim versus a competitive product. However, SPICE does recommend using a single score to assess whether the product has a significantly lower overall footprint **(at least a 10% reduction)** before making a claim on individual indicators. If a company wishes to communicate externally, **SPICE recommends communicating on at least 3 relevant environmental indicators, including carbon footprint. The indicators should represent the most important proportion of the product footprint.**
5. If the impact reduction versus a competitive product is not significant (minimum 10% reduction on individual environmental indicators), **SPICE does not recommend making a claim**. Selected indicators for making claims should be relevant for the product category and should contribute significantly to the single score. In addition, third-party reviews are mandatory when making comparisons with a competitve product in any external communication.

TYPE OF STUDY	STUDY SUBJECTS	BENEFITS AND POSSIBLE COMMUNICATIONS
Screening Product LCA	**Single product in one or several markets**	→ Communicate externally about **your own product's footprint** across different indicators. NB: there is no need for a third party critical review if the external communication is not comparative (ISO 14 044:2006) → Identify parts of the life cycle where your product performs better or needs improvement
Screening comparative LCA	**Single or multiple products + competitive single or multiple products** NB: For competitor data, sources are: publicly-available information, laboratory product tests, in addition to sensibility analysis.	→ Communicate externally about **your own product's footprint** across different indicators. NB: there is no need for a third party critical review if the external communication is not comparative (ISO 14 044:2006) → Identify parts of the life cycle where your product performs better or needs improvement → Give **internal teams** insights into comparative claims that could be made with a full comparative ISO 14040:2006 and ISO 14044: 2006 Life Cycle Assessment
Full comparative ISO-compliant LCA	**Different products** (e.g. for studied products + different competitive products or no competitive products) NB: For competitor data, sources are: publicly-available information, laboratory product tests, in addition to sensibility analysis.	→ Communicate externally about **your own product's footprint versus competitors** across different indicators. NB: the indicators communicated should be the ones that contribute most to the product footprint, as per SPICE packaging claims guidance, page 7.4 → Publicly share impacts of different life cycle stages of your product versus competitors → More robust study with higher confidence in the data → "If the study is intended to be used for a comparative assertion and intended to be disclosed to the public, **interested parties shall conduct (...) a critical review.**" (ISO 14 044-2006)

III. USE OF EQUIVALENCIES

1. To present packaging improvements and comparisons more clearly, **it is recommended to use equivalencies** (e.g. the number of cars taken off the road or km traveled by car*) in addition to scientific units (e.g. kg of CO_2 eq). When making an equivalency statement, **use internationally recognized conversion factors** and explain assumptions in a disclaimer (e.g. the type of car used in calculations). Be mindful of potential misunderstandings when using equivalencies (e.g. cutting down trees when speaking about paper). Make sure that the selected equivalence topic is relevant to the environmental indicator it is meant to illustrate (e.g. number of baths to illustrate water savings, and not number of cars on the road to illustrate water savings).
2. **Equivalencies should be locally relevant.** For example, in the case of energy efficiency, monetary savings and GHG emissions savings will differ based on the price of energy and the energy mix (nuclear, solar, coal) within a country. There are regional and national differences in accepted claims language. **Some markets may have stricter positions or rules depending on local understanding.** This means that standardized communication using equivalencies, e.g. on-pack, may not be relevant at an international level. It is recommended to align equivalencies with the input of local and regional teams.
3. **Equivalencies should be rounded down** to make them as easy to understand as possible by the general public (e.g. 76% should be rounded down to 75%). As approximations exist in any life cycle assessment, the equivalencies used should be conservative to avoid misleading communication and greenwashing.

* Data used for calculating equivalencies come from database such as EcoInvent.

IV. GREENWASHING CAN LEAD TO LEGAL LIABILITY

EXAMPLES FROM OTHER SECTORS

Find out more

Find out more

Find out more

Keurig Recyclable Cups in the US, 2019

Comment from the judge:

"The Green Guide states that if a product is rendered non-recyclable because of its size or its components — even if the product's composite materials are recyclable — then labelling the product as recyclable would constitute deceptive marketing."

Coca Cola's "PlantBottle" in Denmark, 2013

In 2013, Coca-Cola was criticized by the Danish consumer ombudsman regarding the marketing of its "PlantBottle" – partially made from plant-based material but failing to present a "true, balanced, and loyal overall impression" of the product.

The ombudsman cited the use of the word "plant", excessive green colors, and a circular-arrow logo that associated it with the symbol for recyclability.

"100% recyclable" in Germany, 2012

In 2012 Tetra Pak was accused of greenwashing and taken to court by German NGO DUH for making the claim "100% recyclable".

The court determined that Tetra Pak deceived consumers by suggesting that packaging was always completely recycled, while research revealed that only about one-third of materials from beverage cartons sold in Germany were recycled.

ENVIRONMENTAL FOOTPRINT

RESOURCE OPTIMIZATION

RENEWABLE MATERIALS

RECYCLED CONTENT

RECYCLABILITY

COMPOSTABILITY & BIODEGRADABILITY

REUSABILITY, RECHARGEABILITY & REFILLABILITY

“ABSENCE OF” & “FREE FROM”

ENVIRONMENTAL FOOTPRINT

Environmental footprint refers to the impact a company, product, package, or activity has on the environment. For example, the greenhouse gas (GHG) emissions of a package, measured in kg CO_2 eq, have an impact on climate change. Other environmental impact indicators include land use, water scarcity, resource depletion, ecotoxicity, and human toxicity. SPICE Guidelines recommend measuring 16 indicators when doing an LCA, aligned with the European Union Product Environmental Footprint (PEF) recommendations.

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

1. Quantifying an environmental footprint requires a Life Cycle Assessment (LCA), which should follow ISO guidelines.
2. Measurement units, the source of the study and whether it follows ISO guidelines should always be specified.
3. Claims should indicate the scope of the LCA, for example, "cradle to gate" or along the product's full life cycle ("cradle to grave").
4. Claims should always define which indicators the "environmental footprint" refers to (e.g. carbon or water use). It is preferable to state the indicator itself rather than the more generic term "environmental footprint".

SPICE recommends communicating either on:

→ Improvement based on the single aggregated score, by comparing to your own products (previous version or relevant baseline) **or**

→ At least 3 environmental indicators, including climate change. The 3 criteria should contribute significantly to the single aggregated score result. Furthermore, if a company wants to communicate relative improvement on selected indicators, the single aggregated score should be lower **(minimum 10%)** than the baseline (previous packaging or relevant internal baseline).

Please refer to section General Communication Guidance II / USE OF LCA AND MAKING COMPARATIVE CLAIMS

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

To the best of our knowledge, there are no internationally recognized certifications to communicate that a package has a "low" environmental footprint.

Some certification schemes exist which certifiy that a package is compliant with criteria qualifying for "carbon neutral" claims such as:

CARBON TRUST CARBON NEUTRAL | CERTIFIED CARBON NEUTRAL | CERTIFIED CARBON NEUTRAL company CarbonNeutral.com

DISCLAIMERS

1. Carbon neutrality certifications are only delivered by independent certification bodies. Please refer to your internal regulatory and sustainability experts.
2. Please note that the above certifications have trademark guidelines and must be used with a specific licence number by market. Licence numbers are provided by auditing organizations.
3. The list of certifications mentioned above does not constitute a recommendation from SPICE. Consumers' awareness and understanding of the above-mentioned certifications have not been assessed for this document.

RECOMMENDED CLAIMS

Carbon footprint reduced by X% vs. previous version

One-third of the carbon impact compared to X package

A comparative Life Cycle Assessment should be conducted to substantiate comparative claims.
Note that for comparison with a competitor's package, a full comparative ISO-compliant LCA (peer-reviewed) is necessary.

Carbon neutral or CO_2 neutral packaging certified by X

Carbon neutral involves a transparent process of measuring emissions, reducing those emissions, and offsetting or insetting any residual emissions, resulting in net calculated CO_2-eq emissions that equal zero. Carbon neutral claims must be substantiated, verified by a third party and considered on the basis of the full scope of emissions (1, 2 and 3). Note that a carbon neutral claim usually refers to the whole product, not the packaging alone, which might be difficult for consumers to understand. It is up to the brand to evaluate the effectiveness and relevance of such claim.

Eco-designed packaging

This claim can be made only if there has been several actions undertaken to reduce the packaging footprint across different life cycle stages, e.g. material lightening, recycled material added and improvement of recyclability. In addition, there should be a minimum of 10% of the overall footprint reduction versus the previous packaging, and the claim should be substantiated, e.g. Eco-designed using X% less material, by replacing solvent-based inks with water-based, etc. compared with previous packaging design.

X% less carbon emissions or climate impact

X% less water use

X% less impact on land use

versus previous packaging design

These claims can be made if proven by a Life Cycle assessment made publicy available. If not comparative to a competitve product, these assertions do not need a third-party critical review, according to ISO 14 044-2006.

CLAIMS NOT RECOMMENDED

Designed to limit the impact on the planet

This claim is not recommended as it is generalizing and needs to be substantiated with proof-points, e.g. an LCA comparing the impact of one packaging versus a previous version. The concept of "limit on the planet" is also vague.

100% eco-designed packaging

This claim cannot be made. It is not recommended to use 100% in any environmental claims, as it is difficult to substantiate.

Eco-friendly
Environmentally-friendly
Nature-friendly
Planet-friendly
Climate-friendly
100% eco pack
Ecological
Sustainable packaging
Green
Environmentally beneficial

These claims are unspecific and do not respect the general communications guidance. In some countries, the above-mentioned claims are even prohibited by laws. Always check with your local regulatory team.

RESOURCE OPTIMIZATION

Resource reduction means a reduction in the amount of materials, energy or water used to produce or distribute a product, its packaging or an associated component.

Note that the term "resources" includes not just raw materials but also the energy and water consumed.

Resource optimization aims to improve the environmental footprint of a package and reduce adverse environmental impacts throughout the package's entire life cycle (extraction of raw materials, production, distribution, use, and end of life) while maintaining quality during usage (same performance and/or efficiency).

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

1. In principle, any claim on light-weighting (same material type) should be made component by component and by specifying each one.
2. Comparisons (e.g. before/after weight reduction) should be made for the same materials, package and use values. It is recommended not to communicate on package "light-weighting" unless there has been a **minimum 10% threshold improvement** (10% less weight for the same material type); quantities used for the calculation should be historical quantities, not forecasts.
3. It is important to ensure reductions of one package component do not result in a transfer of impacts to other packaging in the complete system. (e.g. reducing the plastic bottle weight leading to increased weight of the folding carton box thickness). Claims shall be made only if the proposed packaging modification does not lead to a higher overall environmental footprint.
4. Weight or resource use reductions expressed as percentages should be **higher than the uncertainties or margin of errors** usually encountered for any given material (usually 10%).
5. Light-weighting claims can be made regardless of a component's proportion of total packaging weight. But the light-weighting (if it is the only claim made) should **by itself improve the overall single score by 10%**, as mentioned on page 7, paragraph II.4. (e.g. if a component weighs only 5% of the total package, you can still communicate on its sustainability improvements). It is up to brands to assess the credibility of making claims if the percentage of improvements is low. Claims should always comply with the communication criteria stated on page 6, paragraph I.
6. If the claim about resource optimization concerns a change in material, e.g. move from plastic to cardboard, then the condition for making a claim should be that the global environmental footprint of the new packaging is not greater than that of the former version.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

There are no official labels or certifications for resource optimization (e.g. lightweight, plastic free, absence of X, mono-layer, etc.).

Data used to make such claims usually comes from companies themselves.

RECOMMENDED CLAIMS

Same formula, compressed format

"100 ml = 200 ml of use" same product, less packaging

If a product's formula is not compressed, then the amount of product contained in the compressed format is smaller. For these claims not to be misleading, they should mention that the use stays the same, even with a compressed format.

Simplified packaging with 2 layers of X material less

This claim should be substantiated with proven reduction in the number of layers or packaging components. "Simplified packaging" is not sufficient as a stand-alone claim".

X% Lighter packaging than previous version

Packaging weight reduced by X% compared to X

This self-declared claim can be made if it is proven and respects the agreed threshold for making light-weighting claims. The claim should also mention the percentage of light-weighting compared to the previous packaging for the same material type.

This packaging saves X% of materials compared to previous packaging version

This claim can be made if it is substantiated by a percentage of material weight saved or reduced compared to a previous version or another format of the same product.

CLAIMS NOT RECOMMENDED

Resource-saving packaging: x trees saved each year (e.g. for a cardboard-based packaging)

This claim is misleading and is a short-cut that should be avoided. It is not possible to trace and verify that "trees are saved" because less cardboard is used for a packaging. It should be communicated in the form of an equivalency instead (e.g. weight reduced by X, X tons of cardboard saved each year = an equivalence of X tons of wood).

Resource-efficient packaging

This claim does not respect the general communications guidelines.

X% less plastics in the oceans

This claim is misleading and is a short-cut that should be avoided. The packaging environmental improvements cannot be directly linked to less plastics leakage in the oceans - this is not traceable or verifiable.

X% plastics coming from the oceans (if traceability of plastics is not demonstrated)

The claim cannot be made because there is no official definition of what "plastics from the oceans" are, there is no tracability of the materials coming from the oceans, and there is no way to know if the plastics come from post-consumer waste. All of the above may lead to confusion for consumers.

RENEWABLE MATERIALS

Renewable materials are composed of biomass from living sources that can be continually replenished, such as trees and plants. Examples of renewable materials are cardboard, paper and bio-based plastics. *Renewable* is often confused with *recyclable*, *biodegradable* or *compostable*. Please refer to the Glossary for more information on terms definition.

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

1. Claims regarding packaging derived from renewable materials do not constitute sufficient criteria to make general statements such as "better for the environment" or "lower environmental impact", which require a multi-criteria Life Cycle Assessment.
2. To make a bio-based content claim, the packaging should contain a "reasonable minimum amount" of bio-based content. According to the EU Bioplastic Association and supported by SPICE members, this is defined as having **20% bio-based content per component**, regardless of the component's weight in the total package. It is not mandatory to specify the generation of bio-based content, but it might have a marketing value.
3. SPICE recommends communicating on bio-based content only if the single aggregated score of the packaging is lower **by at least 10%** (as per SPICE recommendation stated on page 7, paragraph II.4) using bio-based content compared to the previous packaging that did not contain bio-based content.
4. The use of third-party certifications and labeling such as the TÜV Austria STAR system methodology, which certifies the use of bio-based content in packages, is highly recommended.
5. The percentage of bio-based content must always be specified and origin (e.g. sugarcane) must be stated.
6. Today there are 4 generations of bioplastics, depending on the types of biomass used. When making a claim about bio-based plastics, information on the origin and sourcing of the biomass used (feedstock type, sustainability criteria, FSC-certified, GMO-free, etc) should be made available to consumers.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

DISCLAIMERS

1. Please note that the above certifications have trademark guidelines and must be used with a specific licence number by market. Licence numbers are provided by auditing organizations.
2. The list of certifications mentioned above does not constitute a recommendation from SPICE. Consumers' awareness and understanding of the above-mentioned certifications have not been assessed for this document.

RECOMMENDED CLAIMS

Plant-based packaging with X% bio-based plastic from sugarcane

Contains X% bio-based polymers / bio-based plastics

Packaging made with X% renewable materials from X (add origin)

X% bio-based content from e.g. cellulosic

These claims can be made only if accompanied with a precise percentage of bio-based content. SPICE recommends to back-up claims with certifications, e.g. TÜV.

Plant-based packaging should not be used **if the packaging contains non-plant ingredients** (even trace amounts).

This package contains at least X% plant-based materials

Packaging contains a minimum of X% plant-based materials

This package is made with pulp from sustainably (or responsibly) sourced and harvested wood (for cardboard or paper-based packaging)

To make this claim, it is mandatory to have certifications such as registered trademarks for FSC®, PEFC® and SFI®. All claims mentioning a certification or label such as FSC or PEFC should be checked and validated with the respective organizations.

CLAIMS NOT RECOMMENDED

Zero conventional plastic

No conventional plastic used

These claims cannot be made if the packaging contains bio-based plastics, as this is misleading. Bio-based plastics are plastics.

Contains up to 30% plant material

The phrase "up to" can be confusing: it could be 5% or 25%. Therefore, SPICE recommends the alternative claim: "contains at least X% plant material".

Natural packaging

Made with paper, a natural material

A claim simply stating "natural packaging" cannot be made since the term "natural" is not yet clearly defined in authoritative guiding documents, and packaging materials are produced using industrial processes.

"Zero deforestation" packaging

"Free from deforestation" packaging

There is no known certification or label today that verifies deforestation-free claims for packaging.

100% bio-based polymer

100% bio-based content

Made with 100% renewable material

100% plant-based packaging

These claims cannot be made because of the absolute number (100%) given that many renewable materials contain traces of non-renewable materials. These "100% X" claims can be misleading since certain components are not currently made from renewable resources, including some base material additives or inks.

RECYCLED CONTENT

Recycled content refers to materials that were previously used.
The ISO 14021 standard states that only "pre-consumer" and "post-consumer" materials should be considered as recycled content:

- Pre-consumer material:
  "material diverted from the waste stream during the manufacturing process" (also referred to as **post-industrial recycled material** or **PIR**)
- Post-consumer material:
  "material generated by households or by commercial, industrial, and institutional facilities that can no longer be used for its intended purpose." (referred to as **post-consumer recycled material** or **PCR**)

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

1. Recycled content should be mentioned only when it comes from post-consumer recycling. The SPICE Methodology recommends to calculate the percentage of recycled content by considering PCR material for the recycled fraction. SPICE recommends not taking into account post-industrial recycled material in the percentage of recycled content. In some cases, the distinction between PCR and PIR materials appears to be vague. In addition, efforts made to improve circularity at industrial level should be encouraged, even when the actions undertaken do not fall into the PCR category. To tackle this challenge, SPICE will discuss in more details what PCR and PIR mean specifically for the cosmetics industry, and the Claims Guidelines will be updated accordingly.
2. It is recommended to specify the percentage of recycled content, have an external certification if possible, and add any relevant disclaimer related to components, additives, inks or colorants not containing recycled content.
3. In principle, any claim about recycled content can be made per component and specify which component the claim refers to. The material type containing recycled content must also be specified in the claim, e.g. the plastic cap contains 10% recycled or the bottle contains 20% recycled plastics.
4. The percentage of recycled content should be significant enough to make a relevant claim. SPICE does not recommend any minimum threshold. Consumer research shows that the higher the percentage is, the more credible the claim.
5. Recycled content and recyclable are often confused: there should be a clear separation between the two terms when communicating on-pack, and/or an explanation should be given.
6. Recommendations about mass balance related claims are currently being defined.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

THE MOBIUS LOOP INDICATING RECYCLED CONTENT
The % in the middle of the Mobius Loop refers to the % of post-consumer recycled content. The Mobius Loop logo is not subject to trademarks and can be used without an external certification.

Certifications measure the percentage of recycled content for the purpose of making an accurate claim.

DISCLAIMERS

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2. The list of certifications mentioned above does not constitute a recommendation from SPICE. Consumers' awareness and understanding of the above-mentioned certifications have not been assessed for this document.

RECOMMENDED CLAIMS

This package contains X% recycled cardboard

This bottle is made with X% recycled glass

The recycled content should be specified as per the general guidelines and the SPICE methodology for calculating the amount of recycled content should be followed.

X% recycled PET in the bottle and in the cap

This claim should specify which part of the packaging incorporates recycled content.

CLAIMS NOT RECOMMENDED

Circular packaging

Made with circular plastic

"Circular" is vague.

To justify a "circular" claim, every single package would need to be fully recycled and integrated back into recycled materials.

X% recycled content (without specifying the type of recycled content and in which part of the packaging recycled content is used)

This claim should not stand alone; it should specify the type of content and where it is used in the packaging, e.g. X% recycled plastics in the bottle.

RECYCLABILITY

Different definitions of what recyclable means coexist today (the main one being in the ISO 14 021-16). **SPICE is developing one for cosmetics packaging.** As an example, the Ellen MacArthur Foundation definition stipulates:
"Packaging or a packaging component is recyclable if post-consumer collection, sorting, and recycling is proven to work in practice and at scale. The suggested threshold to prove it works 'in practice and at scale' is 30% recycling/composting rate achieved across multiple regions, collectively representing at least 400 million inhabitants. A package can be considered recyclable if its main components together represent more than 95% of the entire packaging weight, are recyclable according to the above definition, and if remaining minor components are compatible with the recycling process and do not hinder recyclability of the main components."

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

1. Claims about recyclability are very important to get right for 2 main different reasons: firstly, it is one of the main ways to engage citizens in ensuring packaging are not littered and get where it needs to be at its end-of-life. Secondly, citizens expect to be guided and be able to sort their packaging in the right bins. Thirdly, it demonstrates brands commitment to contribute to a good waste management systems in their markets.
2. There is a difference between a product that is "designed for recycling / to be recycled" and a product that is actually recycled in practice and at scale. Therefore, these claims are not recommended as they generate confusion for consumers about how to sort the packaging.
3. SPICE does not recommend using the percentage of a recyclable fraction of a product (e.g. 85% recyclable), as it confuses consumers about which bins to use.
4. If a packaging contains components that are separable and recyclable, claims can mention those specific components, if sorting instructions for separable components exist and if the separability works in practice. Some components may not be separable but do not hinder the recyclability of the packaging. In that case, a claim does not need to mention the non-separable components, if recyclable with the main packaging part.
5. SPICE always recommends to consider local collection schemes before making "recyclability" claims since collection and processing vary widely from one country, region and city, to the next.
6. SPICE recommends specifying sorting instructions on-pack whenever possible.
7. Communicated recycling rates should be those provided by official authorities for each market.
8. If the inks used in the packaging design printing process are proven not to hinder the recycling process, then claims about inks are possible (see next page).

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

This symbol indicates that the packaging is made with recyclable aluminum.

The Metal Recycles Forever Mark is trademarked and the exclusive property of Metal Packaging Europe.

The mobius loop without a % means a product is recyclable. It should always be accompanied by a small text to explain its significance.

Specific country-level logos may exist. Always check locally. e.g. Triman logo is currently displayed on packaging that need to be sorted for recycling. It will be mandatory in France on all packaging from Jan 1st 2022 to indicate that they need to be sorted, whether they are recyclable or not.

This symbol asks consumers to not litter packaging and to dispose of properly in a bin. This symbol does not give any indication about the recyclability of a packaging.

RECOMMENDED CLAIMS

Recyclable packaging

This claim can be made only if the full packaging (95% by weight) is recycled in practice and at scale in the country where the claim is made. Always check local sorting instructions.

This packaging is designed to be recycled but is currently not collected for recycling at scale in your country.
This claim is not recommended for on-pack communications

This claim can be made in countries where collection and recycling of a given packaging is not yet in place, while in other markets the same packaging is collected and recycled in practice and at scale.

Water-based inks used for printing

Natural inks used for printing

This claim can be made if the composition of the inks is also communicated, e.g. water-based, solvent-free inks. And in addition, if the inks used are proved not to hinder the recycling process.

CLAIMS NOT RECOMMENDED

100% recyclable

These claims cannot be made because of the absolute number (100%). Products are never 100% recycled in practice. Some brands have been accused of greenwashing when using 100% recyclable claims.

Easy to collect

Easy to recycle

These claims depend on market conditions and various factors at the recycler level. It is not for a brand owner to judge, but rather a consumer perception.

Recyclable where facilities exist

This is a generalized claim that does not convey the limited availability of collection facilities and is irrelevant to people where no collection is available, as per ISO 14 021.

Designed to be recycled

Designed to be recyclable

Designed for recycling

Recyclable by design

Ready to be recycled

Recycle-ready

Recyclable-ready

If a packaging is not recycled in practice and at scale, then the packaging design might not have taken recyclability as a criteria in the packaging development process. These claims might be confusing for consumers where to sort out their packaging either in the recycling bin or in the waste bin.

Improved recyclability

Moving toward recyclability

A packaging is either recyclable or not recyclable. If the brand has made efforts to improve the packaging recyclability, this can be expressed in the brand's sustainability narrative but not as an on-pack claim, as it may confuse consumers whether the packaging is recyclable in practice.

COMPOSTABILITY & BIODEGRADABILITY

A material is deemed *biodegradable* if it can be decomposed by the actions of microorganisms (e.g. bacteria, fungi, algae) and ultimately broken down into water, carbon, methane and other products (such as new biomass) that are not toxic to the environment. Certification schemes are based on European norm EN 13 432.

Compostable means that a product is capable of decomposing into natural elements **in a compost environment (at home or in an industrial facility)**, leaving no toxicity in the soil. Typically this must occur in about 90 days.

Claims associated with biodegradability and compostability are criticized for being confusing and misleading. In some countries, biodegradability-related claims have actually been banned. Claims should always respect the communication guidance highlighted on page 6.

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

Despite biodegradable and compostable packaging being rarely used in the cosmetics industry, this section provides guidance in case brands wish to investigate this topic further.

Regarding biodegradability:

- Claims about biodegradability are sometimes criticised for leading to littering. Therefore, they are not recommended to be used, especially on-pack. Note that in France, for example, the term biodegradable could be banned starting from 2022. The term is also banned in Belgium.

Regarding compostability:

- When packaging is compostable only in industrial facilities (with relevant certification), SPICE recommends not making claims, especially on-pack, as this may confuse consumers about what to do with the packaging. In France for example, the claim "compostable" is not allowed if the composting can only be made in industrial facilities.
- On-pack is the preferred channel to communicate home-compostability to consumers.
- It should be made clear to consumers that compostable packaging still need to be properly sorted and disposed of, i.e. at home.
- The component that is home-compostable should be mentionned.
- SPICE recommends using relevant certifications and be compliant with EN 14046 and ISO 14855 standards.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

Chinese standard GB/T

Jätelaito Syhdistys used in Finland

Canadian standard CAN/BNQ 0017-088

European standard EN 13432
Australian Standard AS 4736

Ramah Lingkungan SNI 7188.7 : 2016

DISCLAIMERS

1. Please note that the above certifications have trademark guidelines and must be used with a specific licence number by market. Licence numbers are provided by auditing organizations.
2. The list of certifications mentioned above does not constitute a recommendation from SPICE. Consumers' awareness and understanding of the above-mentioned certifications have not been assessed for this document.

RECOMMENDED CLAIMS

Biodegradable inks used for printing

This claim can be made if an external certification proves that the inks are biodegradable and can degrade in the recycling process.

Home-compostable packaging certified by X

This claim can be made using relevant certification (e.g. OK Compost) and specify "home compostability" on pack.

CLAIMS NOT RECOMMENDED

Compostable where facilities exist

This is a generalized claim that does not convey the limited availability of composting facilities.

100% degradable

100% biodegradable

100% compostable

Making a 100% claim indicates that the entire packaging (including components like cap, tag, and glue) is biodegradable, which is rarely the case. This claim also does not make end-of-life packaging management clear, which may lead consumers to improperly dispose of the packaging.

Industrially compostable packaging

Biodegradable packaging in industrial facilities

This claim can only be made if substantiated by the relevant certification. Clear instructions should be given to consumers about where to sort the packaging (home or industrial composting. Always check local regulations. In France, this claim is banned.

Biodegradable packaging

Degradable packaging

These claims are not recommended because they do not convey a clear message to citizens about how to sort out the packaging and might lead to littering. For example, in France and in Belgium, these claims might be banned. Always check local regulations.

REUSABILITY, RECHARGEABILITY & REFILLABILITY

This topic covers packaging specifically designed to be used multiple times. This type of packaging can cover different concepts: recharge with another pack, refill from another pack, refill from a fountain/distributor, or reuse for the same purpose.

According to ISO 14021 definition (7.12), **Reusable** is "a characteristic of a product or packaging that has been conceived and designed to accomplish within its life cycle a certain number of trips, rotations or uses for the same purpose for which it was conceived."

Packaging can be considered **rechargeable** if it has been designed to embed a new component containing the formula (i.e. a "recharge"). By default, a rechargeable product is defined as rechargeable one time, as per SPICE Methodological Guidelines. A packaging can be considered refillable if the user can directly pour a liquid formula into the former packaging, either from another packaging or from a fountain/dispenser.

Link to SPICE methodological guidelines for further information

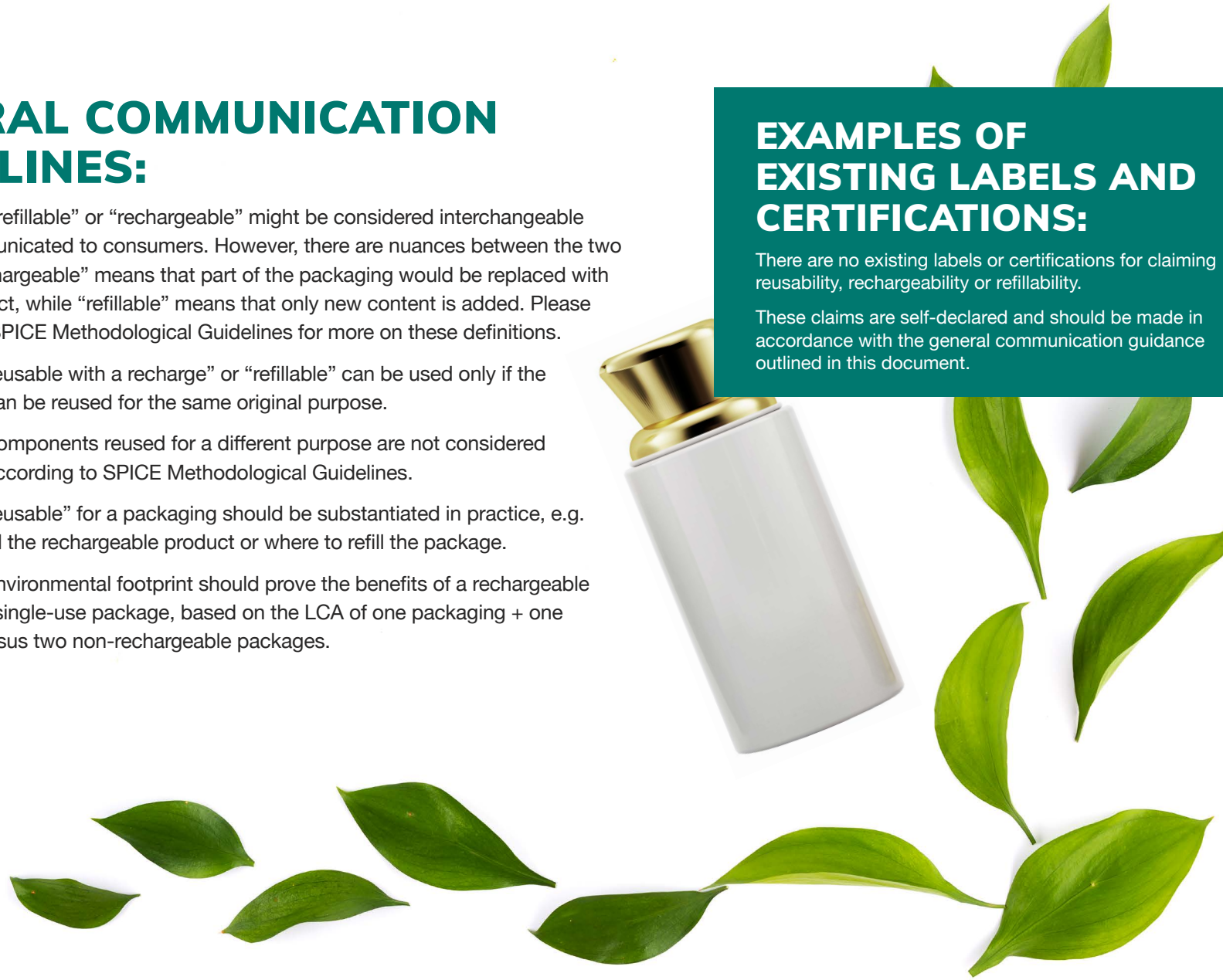
GENERAL COMMUNICATION GUIDELINES:

1. Claims like "refillable" or "rechargeable" might be considered interchangeable when communicated to consumers. However, there are nuances between the two terms. "Rechargeable" means that part of the packaging would be replaced with a new product, while "refillable" means that only new content is added. Please refer to the SPICE Methodological Guidelines for more on these definitions.
2. The claim "reusable with a recharge" or "refillable" can be used only if the packaging can be reused for the same original purpose.
3. Packaging components reused for a different purpose are not considered "reusable" according to SPICE Methodological Guidelines.
4. The claim "reusable" for a packaging should be substantiated in practice, e.g. where to find the rechargeable product or where to refill the package.
5. The global environmental footprint should prove the benefits of a rechargeable package vs single-use package, based on the LCA of one packaging + one recharge versus two non-rechargeable packages.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

There are no existing labels or certifications for claiming reusability, rechargeability or refillability.

These claims are self-declared and should be made in accordance with the general communication guidance outlined in this document.



RECOMMENDED CLAIMS

Refillable

Rechargeable

This claim can be made to specify the packaging type used for the refill, e.g. refillable with the same bottle. The claim should be substantiated in practice by highlighting where consumers can obtain a recharge or where to refill their packaging.

Reusable packaging with a recharge

This claim can be made if the packaging can be reused for the same original purpose only.

CLAIMS NOT RECOMMENDED

Rechargeable under specific conditions

Refillable where available

This claim cannot be made as it is misleading for consumers if they cannot refill or recharge their package in practice.

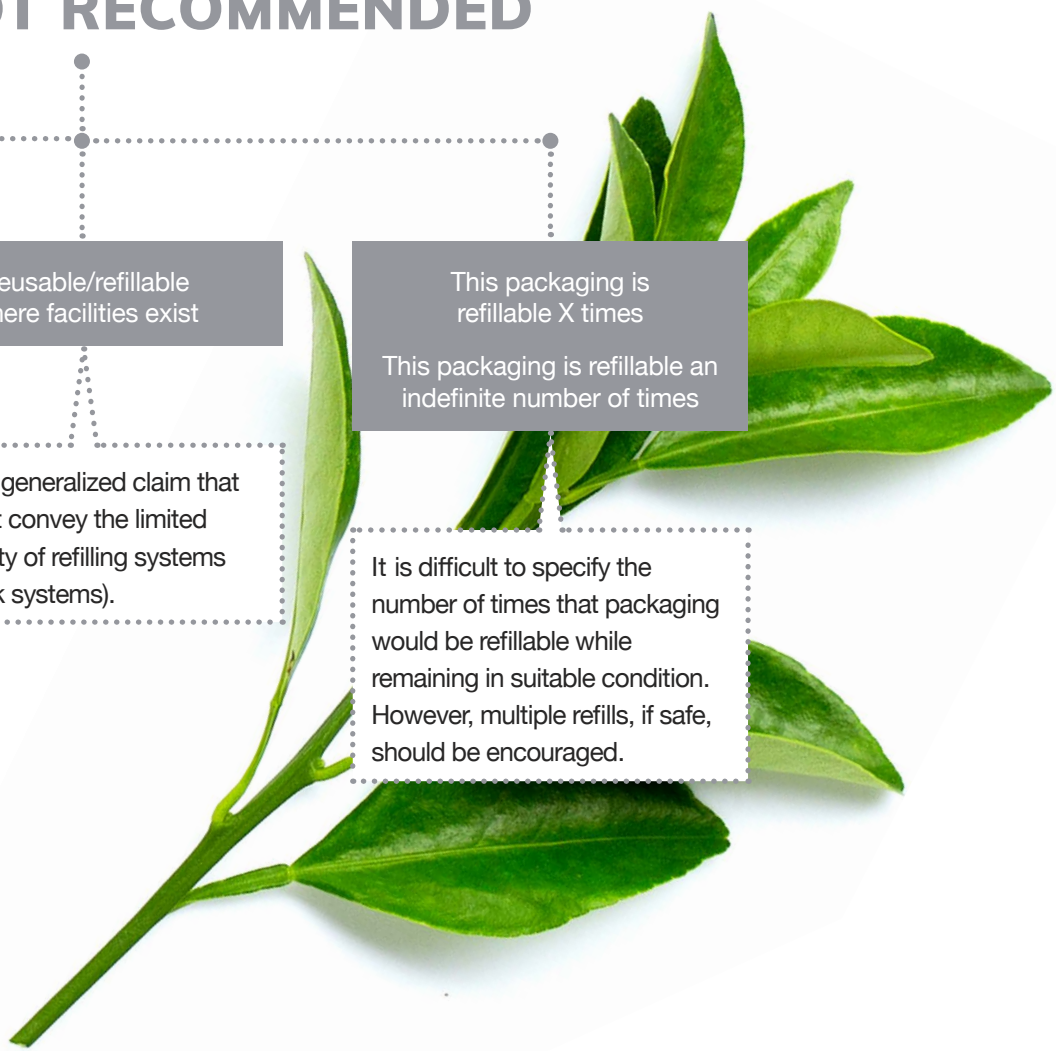
Reusable/refillable where facilities exist

This is a generalized claim that does not convey the limited availability of refilling systems (e.g. bulk systems).

This packaging is refillable X times

This packaging is refillable an indefinite number of times

It is difficult to specify the number of times that packaging would be refillable while remaining in suitable condition. However, multiple refills, if safe, should be encouraged.



"ABSENCE OF" & "FREE FROM"

According to the ISO 14021-2016: "an environmental claim 'XX free' shall be made only when the level of the specified substance is no more than that which would be found as an acknowledged trace contaminant or background level."
These claims ensure consumers that substances identified as potentially harmful to their health or the environment are absent.
It is not recommended to make these claims the main selling point of a product or pack, but they can provide consumers with additional information.

Link to SPICE methodological guidelines for further information

GENERAL COMMUNICATION GUIDELINES:

Absence of or *free from* claims are misleading and should be avoided if:

1. Packaging has never contained the identified substance and never will.
2. The identified substance has been replaced by another one whose impacts on human health or the environment have not been documented.
3. The identified substance has not been formally characterized as one likely to be harmful.

If regulation bans a substance (e.g. BPA or paraben-free), claims such as "no substance X or free from substance X in accordance with current legislation" **is not allowed**.

EXAMPLES OF EXISTING LABELS AND CERTIFICATIONS:

Auditing companies provide certifications for Bisphenol A and phthalates free packaging.

RECOMMENDED CLAIMS

XX free

Free from XX

Absence of XX

These claims can be made **only if** they follow the general claims recommendations stated in these guidelines. In particular, if a regulation bans a substance, claims such as "no substance X or free from substance X, in accordance with current legislation" **is not allowed**.

Plastic-free packaging

This claim can only be made if the former packaging for the given purpose contained plastics, if the packaging was re-designed without plastic, and if the re-design does not lead to a higher overall environmental footprint.

This claim **can't be made if the packaging contains bio-based plastics** - as bio-based plastics are plastics.

CLAIMS NOT RECOMMENDED

Chemical migration-free packaging
Substance migration-free packaging
Safe packaging
Clean packaging
Disruptor-free packaging
Worry-free packaging
Microplastics-free packaging

These claims do not respect the best communication practices as defined in this document.

100% free from
Zero substance X

These claims are not recommended because diffuse environmental contamination and chemicals used in production facilities may contaminate packaging material even when not intentionally added. Sometimes this contamination is below the detection levels of current analytical technology. Therefore, even if not added intentionally, a chemical may still be detected and therefore "zero" presence cannot be guaranteed. This includes "nanoparticle free" claims.

Nanotechnology-free packaging

This claim is misleading as it could convey that the packaging is nano-sized.

Packaging-free product
Zero packaging

This claim is often used when referring to products sold "in bulk". However, it is not strictly true in either a technical or legal sense, as evidently some packaging is required in the initial stages before and after product consumption.

Zero-impact packaging
Emission-free packaging
Zero-emission packaging

Every product and packaging have an environmental impact, so "zero impact" is a misleading claim that is not possible to substantiate. For carbon neutrality related claims, please refer to the section dedicated to Environmental footprint claims.

OTHER CLAIMS

In this section, we highlight some more claims that might be considered for external marketing communications. Examples provided are around fairtrade, vegan, cruelty-free, animal-friendly and localization of packaging production.

RECOMMENDED CLAIMS

Vegan

SPICE recommends using a vegan claim only if it refers to the whole product including the packaging, not the packaging alone. This claim can be made if an external third party has certified that the packaging does not contain any animal substance. Entities such as EVE Vegan can provide certification.
To date, there are no "official" European or international regulations defining vegan quality, just as there is no "high authority" for veganism. The labeling of vegan products is a service offered by independent associative organizations mainly based in Europe, the United States or Japan.

CLAIMS NOT RECOMMENDED

Packaging assembled in X market

This claim is misleading, as packaging components usually originate in different locations.

Animal-friendly packaging

Cruelty-free packaging

These claims cannot be made as they refer to the formula and are not relevant for packaging.

Fairtrade packaging

Certified entities can sell their products with the Fair Trade Certified seal. A percentage of the profits, called the Fair Trade Premium, is distribute to producers, farmers, and workers to promote sustainable incomes and safe working conditions. Today, Fairtrade certifies products and not packaging.

Packaging-free product

Zero packaging

This claim is often used when referring to products sold "in bulk". However, it is not strictly true in either a technical or legal sense, as evidently some packaging is required in the initial stages before and after product consumption.

GLOSSARY

BIOMASS: material of biological origin (e.g. whole or part of plants, trees, agricultural, marine organisms, animals) **excluding** material embedded in geological formations and/or fossilized (e.g. petroleum-based oil or gas) [Source: adapted from EN 16575:2014]

BIO-BASED: derived from biomass [Source: ISO 16559:2014, 4.23]

BIO-BASED PRODUCT: product wholly or partly derived from biomass [Source: EN 16575:2014]

BIODEGRADABLE PRODUCT: breakdown of an organic chemical compound by micro-organisms into carbon dioxide, water, mineral salts, and new biomass [Source: ISO 18606 Packaging and the environment — organic recycling].

CO2E OR GHG EMISSIONS: carbon dioxide equivalent (CO2 equivalent or CO2e) is the unit for converting greenhouse gases (GHG) into carbon dioxide equivalent [Source: ISO 14067]

GREENWASHING: practice of making an unsubstantiated or misleading claim in communications (including advertising) about the environmental benefits of a product or practice

LIFE CYCLE ASSESSMENT (ALSO LCA OR LIFE CYCLE ANALYSIS): methodology for compiling and evaluating the potential environmental impacts of a product or material across its entire lifecycle [Source: Adapted from ISO 14040:2006]

PLANT-BASED: type of biomass where the primary source is a plant material

RECYCLABLE: characteristic of a product, packaging, or associated component that can be diverted from the waste stream through available processes and programs and can be collected, processed, and returned to use in the form of raw materials or products [Source ISO 14021: 2016]

RENEWABLE MATERIAL: material that is composed of biomass and can be continually replenished (differentiating it from “biomass”) [Source: adapted from EN 16575:2014]

RESPONSIBLY MANAGED SOURCES/RESPONSIBLY SOURCED: no overall definition exists, but this term is often used in relation to specific material certifications, e.g. FSC

RESOURCES:

1. ISO 14021 — Environmental labels and declarations — self-declared environmental claims
2. ISO 14044:2006 — Environmental management — Life Cycle Assessment — requirement and guidelines
3. ISO 14020:2000 — Environmental labels and declarations — General principles
4. UN Environment and One Planet Network Guidelines for providing product sustainability information, 2017
5. A Global Mapping and Assessment of Standards, Labels and Claims on Plastic Packaging, Published in April 2020 by UNEP, Consumers International and the One Planet Network
6. EN 16575:2014, Bio-based products — Vocabulary
7. EN 16935:2017, Bio-based products — Requirements for Business-to-Consumer communication and claims
8. EN 16848:2016, Bio-based products — Requirements for Business to Business communication of characteristics using a Data Sheet
9. European Bioplastics Environment communications guide for bioplastics, 2017
10. European Commission Single Market for Green Products Initiative (ongoing at the time of this document)
11. EU Guidance on application of the Unfair Commercial Practices Directive (section1)
12. Directive 2005/29/EC — EU Compliance criteria on Environmental Claims (Outcome of Multi-stakeholder advice to support the implementation/application of the Unfair Commercial Practices)
13. UK DEFRA Guidance December 2016 — Make a Green Claim
14. Canadian Standards Association 'Environmental claims June 2008: A guide for industry and advertisers
15. Australia ACCC "Green Marketing and the Australian Consumer Law", 2011
16. US Federal Trade Commission Guide for the Use of Environmental Marketing Claims 'Green Guides', 2012

SPICE recommends companies discuss claims with their legal department to ensure compliance with laws in each country. It is the responsibility of each company to implement claims that are legally correct, presented with credible proofpoints, to avoid potential greenwashing allegations and reputation damage. The guidance given in this document is not intended as a substitute for legal advice. SPICE does not take any responsibility for legal implications concerning the use of this guidance document, and does not claim that following this guidance document will result in legal compliance.

General sustainability-related claims recommended in this guidance are not subject to approval by SPICE. As no “official approval” of such general claims by SPICE is required (or possible), companies can freely decide to use the claims.

SPICE welcomes suggestions and feedback from companies, members of the SPICE initiative and other stakeholders regarding the content of the guidance.

Get in touch with the SPICE team Visit us