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Response to the consultation on environmental communication

Marks & Spencer is a major retailer of high quality food, clothing and homeware based mainly in the UK but with growing international operations.

In 2007, we launched our Plan A sustainability programme of 100 commitments on social, environmental and ethical issues (revised to 180 in 2010). To date we have made good progress and achieved 95 of these commitments. This has required active communication to our customers, suppliers and employees.

We have also made significant contributions to the UK's Green Claim's Code – a government publication outlining best practices in communicating environmental and social improvement. This guidance creates a set of principles (clear, credible, accurate, and relevant, substantiated and of genuine benefit to the environment) which are then used by companies and regulators to judge the credibility of claims. Complaints about claims made in advertising are invested and adjudicated by the UK's Advertising Standards Authority (ASA) and their rulings provide on-going case histories for future reference. See:

http://www.defra.gov.uk/publications/files/pb13453-green-claims-guidance.pdf

We believe that companies should be encouraged to make a greater use of good quality environmental communications. Whilst it is important to have a framework to ensure that such communications are credible, creativity and technical development should not be artificially restricted in any other way.

It is with this experience that we provide feedback on the European Food Sustainable Consumption and Production (SCP) roundtable's proposals:

Setting the context

We agree that the consumption of products and services within the EU is a major driver of global resource use and that purchasing decision have a significant impact on the environment.

Environmental claims must be clear, credible, accurate, and relevant, substantiated and of genuine benefit to the environment.

- Companies should be **assisted** to quantify and communicate environmental and social improvement. Companies will only continue to invest in environmental improvements if these achievements can be adequately communicated.
- The science and methodologies used to manage environmental performance are developing rapidly. EU guidance or legislation should take the form of a **principles based framework** to avoid becoming obsolete quickly or restricting innovation. Specific industry examples can be developed by trade associations as required.
- The SCP's guidance should focus on the range of legitimate options available to communicate environmental performance and must **avoid prescribing types, formats or locations of claims**.
- Consumers and professional procurement organisations should be **encouraged** to use this information in their purchasing decisions.

Business to Consumer

General comments

In addition to the work of the SCP, we are aware of at least four other major collaborative projects to develop scientifically reliable methodologies for assessing the environmental impacts of food products. These being the international Consumer Good Forum, the US based Sustainability Consortium, Grenelle 2 in France and the Product Research Forum in the UK. It is important that all four initiatives collaborate to avoid duplication and inconsistency and maximise benefits.

We agree that terms such as 'green', 'eco' an 'environmentally friendly' are vague, potentially misleading and should be avoided. However, where space permits, if an issue is new to the consumer or several issues are covered by a single claim it can be useful to use one of these generic terms as an introduction as long as the benefits are clearly defined and explained. For example, a number of our suppliers have set up 'eco-factories' which use at least 50% less water and energy than equivalent factories.

We agree with the Sustainable commentary regarding the advantages and disadvantages of different approaches. However, environmental issues continue to evolve and we do not support the prescribing of types, formats or locations of environmental communications.

On-pack

We support the recognition that space and competition between different labelling schemes for different sustainability issues is a major constraint with on-pack labelling.

However, we do not believe it is helpful to make recommendations on which types of communication should be used on-pack. Arguably ISO type II claims (voluntary third party multi-issue) could also be shown on-pack although this is not included in the existing guidance.

On-shelf

On-shelf communications can be useful in highlighting the product and in some cases providing additional information. For example, we have used short video-clips to illustrate farming practices.

Again, we do not believe it is helpful to recommend which types of communication should be used on-shelf. We strongly disagree with the recommendation that only certification scheme messages are suitable for this format. We regularly use ISO type II (voluntary self declarations) and cause-related marketing messages successfully on-shelf.

Price terminal/ barcode/smart phones

We agree that the use of these technologies is likely to grow but is dependent on technological development and accessibility.

Again, however, we do not believe it is helpful to recommend which types of communication should be used in these formats. It is possible that these technologies could be used to provide more complex information far beyond the communication on certification schemes recommended in the draft guidance.

Leaflets

We agree with the environmental rationale for limiting the use of leaflets.

Till receipts

We have found that using till receipts can be effective in encouraging involvement in an environmental or charitable activity but can also slow down the till point operation. We support the guidance's recommendations that till receipts have limited applications for communicating environmental information.

Marketing and PR

The draft guidance rightly recognises the important and far ranging roles of marketing, advertising and PR. However, we believe it is appropriate that the SCP should provide constructive guidance in order encourage effective environmental marketing and PR.

For example, the UK Green Claims code recommends that environmental marketing and PR should be clear, credible, accurate, and relevant, substantiated and of genuine benefit to the environment. It then suggests that any images used are relevant to the claim and not misleading, that comparisons

are fair and relevant and that any methodologies used are explained in footnotes. We support the inclusion of guidance on marketing and PR.

Social media and the internet

Different forms of social media will impose their own technical limitations (e.g. 140 characters on Twitter). We agree with the guidance that social media and the internet can be used to communicate a wide range of environmental messages.

We have found social networking sites to be useful for informing customers about new environmental or cause-related-marketing campaigns whilst websites can provide a greater depth of policy and technical content.

The same guidance on being clear, credible, accurate, and relevant, substantiated and of genuine benefit to the environment also applies.

Yours Faithfully

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Sustainable Development

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