

## USE OF ENVIRONMENTAL CLAIMS IN THE MARKETING OF CARS

These guidelines cover the principles governing the use of environmental claims in the marketing of cars. The Consumer Ombudsman has prepared these guidelines together with the Association of Automobile Importers in Finland and the Finnish Central Organisation for Motor Trades and Repairs.

When using environmental claims, care must be taken to ensure that

- comparisons are only made between cars of the same size category.
- marketing conveys an accurate and truthful overall impression to the consumer.
- claims are based on proven facts.

### **“Our new model is better than other cars in terms of its environmental impact because...”**

The development of car parts and characteristics has resulted in solutions to reduce the negative environmental impact of cars. In marketing, these improvements can and should be communicated to potential buyers to highlight what advantages the car offers over other cars of similar type. However, in doing so, the following rules must be followed:

- Comparisons can only be made to similar cars. Marketing can specify improvements compared to other cars in the same size category. For instance, a small family car may not be compared to a large sedan or SUV.
- Environmental claims must concern characteristics that are significant to the car's environmental impact. Such characteristics include carbon dioxide emissions, regulated emissions, the car's manufacturing process and distribution system, the car's technical solutions, noise levels and recycling.
- All factual claims must be backed by proof. This proof must be available when the marketing campaign is launched. As the amount of scientific data on the environmental impact of commodities increases constantly, marketers must pay particular attention to keeping the proof behind the claims up to date.
- Where claims based on external tests or research are used, the source of information must be specified in advertising. The advertiser may not draw their own conclusions or generalisations from external studies. If test results are referenced only partially, the advertisement may not be misleading with regards to the overall results of the study.

## **Marketing must convey an accurate and balanced overall impression**

Marketing is assessed based on the overall impression it conveys to consumers. When planning advertising campaigns, the marketer must always ensure that the overall impression conveyed is accurate and based on facts. The significance of a single environmental characteristic may not be emphasised in such a way as to make the overall impression conveyed in the marketing misleading.

If the new version of a particular car model features a minor improvement regarding its environmental characteristics, any marketing messages concerning it must be in correct proportion to the car's environmental impact on the whole.

Another practice to be avoided is overstating the impact of a consumer's single purchase decision on the state of the environment. Even cars with reduced emissions or other environmental impacts pose a burden to the environment.

Marketing may not convey the impression that a consumer could do his share to slow down climate change by a single purchase decision. Instead, consumers may be stimulated to think about their own consumption behaviour and climate trends.

The terms used in marketing should be ones that the average car buyer understands. Complicated expressions or expressions that are open to several different interpretations should be avoided.

## **Avoid unspecified, generalised and exaggerated claims**

Cars burden the environment in several ways during their life cycle (among other things, through the raw materials used in their manufacturing, the manufacturing process itself, distribution, use, maintenance as well as characteristics when the car is taken off the road or scrapped inappropriately). Environmental impacts are not commensurable, as several different factors impact the environment in different ways over the life cycle of a car.

Car marketers must avoid using such expressions concerning the car's positive environmental impact that convey to consumers the impression that the car in question is generally better for the environment than other cars on the market.

Instead of generalised claims, marketing can specify technical improvements that reduce the car's harmful environmental impact. Any such claims must be backed up by proof.

## **Indicating carbon dioxide emissions**

The indication of carbon dioxide emissions of passenger cars is subject to Government Decree 938/2000 on indicating fuel consumption and carbon dioxide emissions of cars. The Decree states that this information must be provided in an easily readable and understandable manner and at least as prominently as the other information in the advertisement (e.g. print ads in newspapers and magazines, brochures, Internet websites).

The Decree also states that where several models are advertised at once, the emissions figures or ranges of all passenger cars included in the advert must be disclosed.

Emissions figures may not be indicated as e.g. "CO<sub>2</sub> starting from 130g/km".

The Decree does not cover television advertising. However, emissions figures must be disclosed in television adverts if a specific reference is made to the environmental impact in terms of emissions for a specific car.

## **Environmental activities can be described in corporate image advertising**

Corporate image advertising does not focus on specific products, but rather serves to create a positive image of the company by explaining e.g. its operating principles, objectives and product quality. Corporate image advertising can be used to describe the contents of the car manufacturer's environmental programmes, such as measures taken to reduce the environmental impact of the car manufacturing process or to improve the recycling of cars and car parts.

The information provided in corporate image advertising must be significant in terms of the environmental impacts of cars. Marketing may not convey an impression of a car as an environmentally friendly product.

Corporate image advertising may also describe measures other than those directly related to reducing the carbon dioxide emissions of cars, such as planting trees. Such measures may not, however, be linked to the marketing of a specific car. The measures described must also be significant in relation to the overall context and their environmental impacts must be backed by proof.

Marketing may not convey the impression that a consumer could compensate for the negative environmental impacts of a car through the car company's promise to plant a tree if the consumer buys the car in question.

### **Appendix: Examples of the use of environmental claims in car marketing**

## EXAMPLES OF THE USE OF ENVIRONMENTAL CLAIMS IN CAR MARKETING

### Allowed

- “We donate 100 euros for Baltic Sea conservation for each car sold.”
- “The product development of this car has resulted in lower carbon dioxide emissions.”
- “XX% of the materials used in manufacturing this car are recycled.”
- “We give you a free training course in economic driving when you buy a new or used car.”
- “We work to change the driving style of car owners towards a more environmentally friendly direction.”

### Not allowed

The advertisement features a picture of a car. The accompanying text states:

- *“drive a green car now with a clear conscience”.*  
The claim is not specific.
- *“no matter what the colour you choose, our car is always green.”*  
The claim is not specific.
- *“our car is the cleanest”.*  
The claim is not specific.
- *“the car has low carbon dioxide emissions.”*  
The emissions are not lower than those of similar models offered by competitors.

The advertisement features a moving car with *“air bubbles” coming out of the exhaust and cleaning the air.*  
The impression of a car that cleans the air has no basis or justification.

The advertisement features a car driving on a snowy road in Lapland. The accompanying text states, *“help keep snow under the skis of the Finnish winter sports team. Help prevent climate change”.*  
The claim is not specific

The advertisement features a car with accompanying text stating *“with prices starting from” as well as the lowest fuel consumption and carbon dioxide emissions figures for the entire lineup for that particular model.*  
The “prices starting from” refers to a different type of car than the accompanying data on fuel consumption and emissions.