

GREEN-WASHING: WHAT IS A MEANINGFUL ECOLABEL

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BACKGROUND AND OBJECTIVES

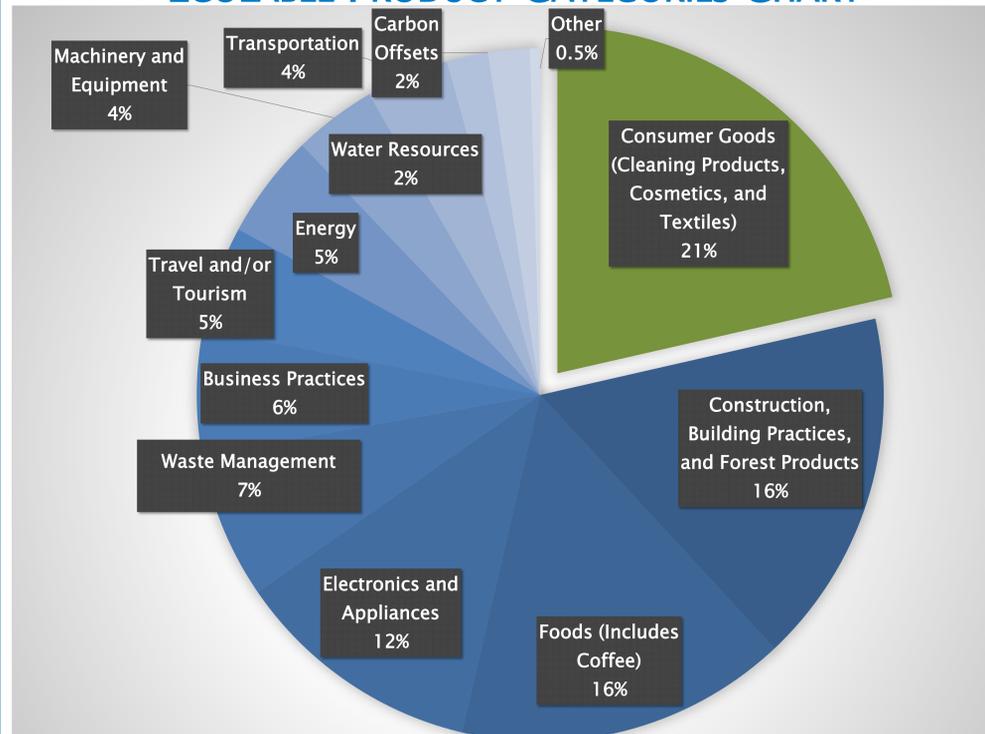
Currently there are over 400 ecolabels for food and consumer products in the global marketplace. These labels are marketing efforts informing the purchaser of a variety of claims of sustainability measures enacted by companies. The marketplace is flooded with several similar claims on whether a product is less hazardous, sustainable, organic, non-GMO, fair-trade, recyclable, recycled, carbon neutral, or biodegradable. Generally there are four types of labels in order of volume, 1) voluntary environmental certification programs, 2) self- or 3) cause-related claims and 4) governmentally regulated. The federal, some state, and international governments have limited direct roles in ecolabeling beyond mandatory hazard warning (e.g., pesticide or Prop. 65) or informational disclosures (EPA fuel economy, certified organic, WaterSense, or Energy Star). There are several third-party certification and quasi-governmental programs that lend credibility to an ecolabel; however, standardization or centralization of these programs are lacking.

PROPOSED APPROACH FOR REVIEWING HAZARD BASED ECOLABELS

Initial screening of 463 ecolabels from the open source non-subscription version of the Ecolabel Index (Big Room Inc., 2015) identified hazard based ecolabels.

- What are the products, services, or issues defining the ecolabel?
- Conformity of criteria or standards performed by independent 3rd party, self-certify (2nd party), or declaration based non-standard 1st party?
- Are the criteria or standards published, freely accessible, or fee-based?
- Does a product or company get audited for conformity to criteria or standards?
- Are their enforcement methods for non-compliance?
- Is there recertification or re-review after a period of time?

ECOLABEL PRODUCT CATEGORIES CHART



Ecolabels with ecological and human health hazard criteria were associated with "consumer goods", namely, cleaning products (73), cosmetics (66), and textiles (108). There were 144 unique consumer good labels as some ecolabels overlapped between the cleaning product, cosmetic, and textile subcategories.

CONSUMER GOODS ECOLABEL REVIEW

| | Consumer Goods (144) | Cleaning Products (73) | Cosmetics (66) | Textiles (108) |
|---|----------------------|------------------------|----------------|----------------|
| Non-Profit | 80 | 35 | 37 | 61 |
| Profit | 37 | 18 | 18 | 25 |
| Governmental | 16 | 13 | 6 | 13 |
| Industry Association | 9 | 4 | 2 | 6 |
| Declaration based (1 st party) | 9 | 2 | 3 | 7 |
| Self-certify (2 nd party) | 38 | 18 | 20 | 30 |
| Criteria fulfillment reviewed by independent entity (3 rd party) | 94 | 51 | 41 | 69 |
| Published and publically available standards | 111 | 61 | 46 | 74 |
| Published fee-based standards | 28 | 2 | 10 | 23 |
| Audit | 115 | 53 | 47 | 87 |
| Recertification | 81 | 50 | 30 | 39 |
| Enforcement | 81 | 50 | 30 | 39 |
| Hazard review | 32 | 29 | 14 | 22 |
| Hazard review – published criteria | 25 | 23 | 13 | 18 |

RESULTS AND DISCUSSION

- 6% of the consumer goods were declaration based, no associated standard ecolabels also called Type III per The International Organization for Standardization (ISO).
- 26% were self-declared environmental claims (Type II ISO standards).
- 65% of the consumer goods ecolabels were reviewed by an independent 3rd party reviewers (Type I ISO standard).
- The ISO Type I ecolabel association, Global Ecolabelling Network, harmonizes 25 ecolabel organizations worldwide. However, the ISO standards are not freely accessible. 19% of the consumer good ecolabels have fee-based standards.
- 77% of the ecolabels had publically available standard.
- 56% of the ecolabels had recertification reviews within 1–2 years of initial award.
- 56% of the ecolabels reviewed had some form of enforcement against companies or products that failed to conform to criteria or standard once awarded.
 - Deceptive claims are primarily discovered by concerned citizens or watchdog non-governmental organization.
- Review of the 25 published hazard standards indicated that hazard data and hazard identification from Authoritative peer-reviewed open-sources were preferred.
 - Globally Harmonized System of Classification and Labelling of Chemicals (GHS CLP), EU's Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH), California EPA's Proposition 65, U.S. EPA and Europe's pesticide data, U.S. EPA's Integrated Risk Information System (IRIS), and Agency for Toxic Substances and Disease Registry (ATSDR), NTP (National Toxicology Program), and International Agency for Research on Cancer (IARC).

FUTURE RESEARCH

Compare Hazard Based Criteria or Standards

- Do all products need to conform to performance standard?
- What are the ingredient and impurity thresholds across the standards?
- What are the ecological endpoint standards? Are there study standards?
 - Ready biodegradability; aquatic toxicity (acute and chronic); bioaccumulative
- What are the human health endpoints? Are there study standards?
 - Cancer, developmental/reproductive, genotoxic, mutagen, acute toxicity, repeat dose toxicity, skin irritation, eye irritation, skin or respiratory sensitizer and possibly endocrine disrupting or neurotoxic
 - Is route of exposure considered?
- In the case of a data gap for a standard what is acceptable?
 - Private-study data (GLP, standards, QA/QC)?
 - Quantitative structure-activity relationship modelling?
 - Read-across?
 - Weight of evidence?

Transparency of Review for Ecolabel

- Are the reviews for ecolabel published and/or freely accessible?
- Is there a way to protest a ruling from review?
- Is there a me-too fast-track review?

Standardization of ecolabels have been driven by VOLUNTARY programs or mandates for sustainability such as governmental green procurement. How have the influenced criteria/standards for ecolabels?

- United States Executive Order (EO) 13693
- European Commission – Green Public Procurement
- Australia – Sustainable Procurement Guide
- South Africa – Sustainable Public Procurement
- China – Green Public Procurement

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