



## British Glass

CMA Draft guidance on environmental claims on goods and services – response

British Glass is the representative body for our UK glass industry, which contributes around £1.3 billion to the UK economy each year and provides more than 120,000 jobs across the supply chain.

### Scope

3.1 Does the draft guidance cover all the important consumer protection law issues relating to the making of environmental claims? If not, what else should this guidance include and why?

N/A we are not experts in consumer protection law.

3.2 The draft guidance applies to business-to-consumer relationships, and to a more limited extent, to business-to-business relationships. Is it helpful to cover both?

Yes, this is particularly relevant to packaging materials as they are often marketed to both businesses and consumers based on their environmental credentials.

3.3 The draft guidance, and UK consumer protection law itself, applies across all sectors of the economy and to all businesses selling goods and services. Are there any sectors which require special treatment either in the draft guidance or separately? If so, which sectors and why?

### Principles for compliance

3.4 The guidance sets out six principles for business compliance with consumer protection law to avoid 'greenwashing'.

3.5 Are these principles the right principles under consumer protection law? If not, what other principles would help businesses comply with consumer protection law.

N/A we are not experts in consumer protection law.

### Case studies

3.6 To help businesses engage with the principles, guidance and consumer protection law compliance more generally, we have included a range of case studies. Would further case studies be helpful? If so, please suggest topics for these case studies and, if possible, provide examples of when these issues would arise.

We are starting to see new innovative packaging solutions marketing themselves as better for the environment, without making it clear that they are not widely recyclable.

A good example of this is a paper wine bottle with a multi-layered plastic liner which is marketed based on its low carbon footprint, lightweight and recycled paperboard outer. The website gives the impression that both the outer paperboard and the inner plastic liner can be recycled easily. However, the plastic liner is not widely recyclable in the UK.

### British Glass

9 Churchill Way, Chapeltown, Sheffield, South Yorkshire, S35 2PY. UK.

Tel: +44 (0) 114 290 1850, Fax: +44 (0) 114 290 1851

[www.britglass.org.uk](http://www.britglass.org.uk)



General and additional issues

3.7 Which, if any, aspects of the draft guidance do you consider need further clarification or explanation, and why? In responding, please specify which Chapter and section of the draft guidance (and, where appropriate, the issue) each of your comments relate to.

3.8 Overall, is the draft guidance sufficiently clear and helpful for the intended audience?

Yes, the guidance was very clear and helpful.

12

3.9 Are there any other comments that you wish to make on the draft guidance?

No

