

Competition and Markets Authority
The Cabot
25 Cabot Square
London
E14 4QZ

Royal Mail Headquarters
185 Farringdon Road
LONDON
EC1A 1AA

16th July 2021

Dear Sir/ Madam,

CMA draft guidance for businesses about 'green' claims

As the UK's sole designated Universal Service Provider, Royal Mail delivers a 'one-price-goes-anywhere' service on a range of letters and parcels to over 31 million addresses across the UK, six days a week. Business and advertising mail are among the many services we offer. Mail remains the third largest advertising medium in the UK. It plays an important part in supporting the UK economy.

We support the CMA's draft guidance for businesses about misleading green claims. We see the six practical steps in the guidance as a means to supplement existing consumer protection law and help businesses comply with their legal obligations to consumers. We also welcome the inclusion of case studies in the guidance. We know through working with brands that they value the clarity that best practice guides can provide them at a practical level when implementing their activities.

The guidelines, including the case studies, are particularly helpful for advertisers at a time when the volume and frequency of communications that contain environmental messaging continues to grow. Our own research shows that, in the past 12 months, 42% of our customers have been asked by at least one organisation they deal with to switch from receiving communications in the mail to receiving them online, in large part because this is supposedly environmentally beneficial. This trend is set to continue as businesses seek to innovate and influence consumer behaviour at a faster pace than ever before in the context of growing customer demand for sustainable products.

Often these "go paperless" claims are not specific and are not supported by reliable scientific evidence or relevant lifecycle analyses. The reality is that both mail and digital communications have an impact on the environment and it is not easy to determine which has less impact than the other. Such messaging is potentially misleading. It distracts from unsustainable practices and can get in the way of legitimate, environmentally sound initiatives being taken up by companies. The CMA's guidance to consider the full lifecycle of a product is especially relevant here.

We find that bigger brands tend to be more active than smaller ones in encouraging people to go paperless. We appreciate the one size fits all approach the CMA is taking as a means of protecting against this because bigger brands often have larger customer communications budgets and so any misleading messaging they undertake could have a more detrimental impact to consumers.

We also believe the guidance will be beneficial to both business-to-consumer (B2C) and business-to-business (B2B) communications. Providing a consistent framework in assessing and evaluating

future communications reduces the risk that messages presented in a B2B environment spill over inappropriately into a B2C environment. For example, a supplier of a component part to a brand may claim certain environmental credentials which the brand then uses in its own communications to the consumer, so the consistent framework protects against those consumers being misled.

This ties back in with the CMA's recommendation around the full lifecycle of the product. For example, independent research organisation Quantis conducted a lifecycle assessment (based on ISO standard ISO 14040-14044) into different communication formats, from catalogues to billing and statements, on behalf of La Poste (France's Universal Service Provider). It found that, in most cases, print came out as the most sustainable option when the full lifecycle is considered. For more information on the research and to access their life cycle calculator, visit:

https://translate.google.com/translate?hl=en&sl=fr&u=http://media-positive-impact.quantis-intl.com/&prev_search&pto=aue

Overall, we believe the CMA's work will help ensure consumers are presented with clearer, more consistent messaging, making it easier for them to make more informed decisions in the future. As the largest channel for mail marketing, we are keen to work with you to ensure this is the case when it comes to both online and offline advertising. If there are any points that you would like to discuss here, please do not hesitate to contact me at [✉] [REDACTED]

Yours sincerely, [✉]

[REDACTED]

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