

DMA Response to CMA Green Claims Consultation

About the Data & Marketing Association (DMA)

The DMA is Europe's largest trade body in the data and marketing industry, representing over 1,000 data-driven companies across the UK.

The DMA played a major role in the shaping of the GDPR data protection laws in the UK and EU and led the implementation in our industry as the trusted source for industry advice and guidance.

The DMA continues a leading role in discussions around data, tech and AI, ethics, marketing and beyond. Our Value of Data campaign—led in partnership with Edinburgh University's Design Informatics Department and the Bayes Centre—is leading the way in providing a place for discussions about the ethical use of data.

Response

The DMA supports both the principle and practice of the proposed guidance, which will add to the UK's strong regulatory sphere.

Given the urgency of the climate change crisis, it is more important than ever to ensure all are playing their part to reduce emissions. In doing so, organisations must be honest about the claims they make so that people can make informed decisions about their consumer choices.

DMA member Royal Mail research showed that *"42% of people have been asked by at least one organisation they deal with to switch from receiving communications in the mail to receiving them online, in the past 12 months"* in large part because this is supposedly environmentally beneficial. (Research: Business Mail by Trinity McQueen June 2021)

The Advertising Association of which the DMA is a member along with ISBA and the IPA, have taken the lead on what the industry can do to get its own house in order as regards the race to net zero.

In November 2020, they launched Ad Net Zero, the advertising industry's initiative to get the entire industry to real net zero by 2030. The Ad Net Zero Action Plan consists of actions on five fronts to achieve this:

1. Advertising businesses' own operations – all companies commit to curtail their carbon emissions, principally by reducing travel, fossil energy use and waste.
2. Advertising production – advertisers, agencies and production companies commit to adopt tools and training to curb production emissions, such as AdGreen's (the UK's first zero-carbon, zero-waste production standard).

3. Media choice – media agencies commit to the IPA Media Futures Group Climate Charter, working with their clients to develop lower carbon media plans.
4. Awards and events – organisers build sustainability criteria into awards, and plan events to minimise their carbon footprints, especially from travel.
5. Using advertising’s positive influence – agencies and clients harness the power of their advertising to promote more sustainable consumer choices and behaviours.

At the time of writing, there are 60 organisations registered as Ad Net Zero supporters across the industry.

However, many of such messaging has contained misleading claims to consumers about the environmental impact of advertising mail and other print in comparison to digital channels. This activity has unfortunately sharply increased during the 12-month period.

As with many aspects of the advertising industry, the print sector must work to combat declining consumer trust. A key way to do this is ensuring organisations are transparent about their objectives, and not use greenwashing as a reason to mask these.

A key example of a common misleading greenwashing statement is something akin to “Go Green, Go Paperless”. This implies paperless methods of administration are more environmentally friendly when that is most commonly not the case. This is hugely damaging to an industry that employs in the UK alone, 116,000 people (1,096,000 EU), in more than 8,400 business (115,700 EU).

On a positive note, research by Two Sides shows that half of consumers do not believe organisations’ claims that switching from paper to digital communications is environmentally beneficial. 52% of UK consumers (49% EU) know that this is down to cost saving.

The guidance should be very clear about what greenwashing is. It would be helpful to include clear examples in the guide that illustrate what greenwashing printed communications may be and case studies to show what would be acceptable as well as unacceptable, and how marketing claims might be appropriately adapted under the guidance for each of the six principles.

The DMA would be happy to work with members to provide such examples. Similarly, we would be happy to discuss the topic in greater detail should it be helpful. Please contact

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