

Sustainability Claims Good Practice Guide

Sustainability Standards Systems' Guide
to Developing and Managing Environmental,
Social and/or Economic Claims

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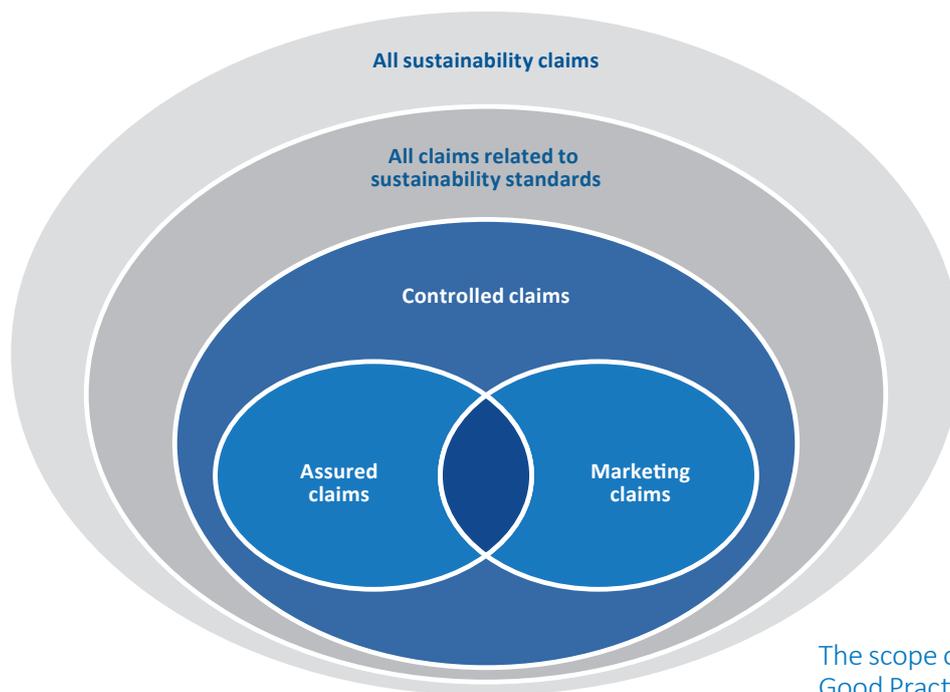


Sustainability Claims Good Practice Guide

This document has been developed to guide **scheme owners** in the development and management of their policies and systems for controlling claims and labels related to their standards system.

As well as giving recommendations for good practice in many areas, it also highlights the strategic decisions that a scheme owner needs to make regarding its claims rules and practices.

In developing this Good Practice Guide, ISEAL's objective is to improve the credibility of claims about sustainability standards systems to lead to greater uptake and trust of these claims.



The scope of the Good Practice Guide

Introduction

There are a myriad of ‘sustainability claims’, which are based on a diverse range of criteria, including claims of meeting a standard, membership claims, endorsements, ratings in a sustainability index and more.

For those claims based on sustainability standards, it is important that there are effective systems in place to manage the claims process and contribute to the credibility of the overall standards system. This document describes those supporting systems and the related good practice in each. The approach used is to provide an understanding of the strategic decisions that need to be made, rather than being prescriptive about what those decisions should be. Claims may be consumer-facing or business to business.



Definition A sustainability claim

For the purposes of this document, a sustainability claim is defined as a message used to set apart and promote a product, process, business or service with reference to one or more of the **three pillars of sustainability**.

- > social,
- > economic and/or
- > environmental¹

This guide is designed to apply to all ‘claims’ that fall within the scope of the document, but there is not a set formula for what makes a claim. Many claims contain a combination of a logo (if used), a text claim and access to further information. Logos and ecolabels are the most recognisable forms of sustainability claims, and are a tool used in many standards systems to help consumers easily identify products in the marketplace that comply with a standard. In many markets they are also the component most trusted by consumers on products with sustainability claims. If choosing to use a logo, there are special considerations which are also discussed in this document.

Scope

As noted above and in the diagram above, a subset of all sustainability claims are those related to sustainability standards. Within this subset,

- > claims can be about the intent or mission of the standards system,
- > the impacts of that system,
- > compliance with the standard (assured claims), or
- > can be more general marketing or promotional type claims.

Assured claims and marketing claims fall within the category of claims that are controlled.

¹See Key Point | The word ‘Sustainable’ (page 1) for considerations regarding the word ‘sustainable’

Additionally, there are different ‘claims makers’, including

- › the users of the standards system (eg, producers, supply chain, etc) and
- › other stakeholders (eg, NGOs, academia, etc).

This guide focuses primarily on the ‘controlled claims’ made by users of standards systems, including the ‘assured’ claims and ‘marketing’ claims about the standards system.

Within scope



Definition A controlled claim

A sustainability claim directly linked with the standards system and which requires approval for use.

Controlled claims include assured claims and marketing claims



Definition An assured claim

A claim that results from an assurance process against the standard. Refers to claims about a product, process, business or service that has been certified or verified in compliance with a standard.

For example

Use of logos/labels/trustmarks and claims of certification against a standard



Definition A marketing claim

A claim that is used to promote an aspect of, or a relationship with, a standards system. It is not always completely distinct from an assured claim. (eg, an advertisement promoting a certified product).

For example

Promotional posters, that are not product specific, where the use of the claim is clearly for marketing purposes alone.



Out of scope

- › Claims made about the impact of the standards system – this is covered by ISEAL’s Impacts Code
- › Claims made by scheme owners about the intent or mission of the standards system
- › Other claims that are not required to be controlled



Key point

Is it a sales conversation? Or a claim?

Particularly in the context of B2B transactions it is not always easy to determine what claims need to be controlled.

Where purchasing decisions are being made on the basis of a claim that is not supported by additional information, this should be controlled. Where a scheme is being presented more in a dialogue, eg, in a sales meeting, this can be seen as more of an explanation and control of this is less critical.

Some scheme owners have exceptions for one-to-one presentations, with approval only required if it is a broader audience or will be available online. Consider what is most appropriate for your system.

The types of sustainability claims related to standards systems occupy a spectrum from those that should be tightly controlled to those that it is not worth the disproportionate effort to control.

Those that should always be controlled are registered copyrights, product specific claims and others. At the other end of the spectrum are those that are nearly impossible to control, such as coverage in the media or in academic papers.

In between are those that are not essential to control, but are recommended to improve consistency of claims, like general statements of support in annual report. This document covers those claims that are essential and recommended to control.

See more on what constitutes a controlled, assured or marketing claim in **Table 1 | Types of claims**, page 10



Overview of the Good Practice Guide

Overview of the Good Practice Guide

The guidance in this document is divided into three main sections, beginning with considering the development of your claims, documenting the rules for use of claims, then describing the systems for managing a claims programme.

There are also a series of annexes that provide additional information, examples and further resources.

Intended users of this document

The intended user of this document is the ‘scheme owner’, as they develop and improve processes regarding claims development and management. The scheme owner is the organisation that determines the objectives and scope of the standards system, as well as the rules for how the scheme will operate and the standards against which conformance will be assessed. In most cases this is the standard-setting organisation, however it may also be an assurance provider, a governmental authority, trade association, group of assurance providers or other body. Though the guide covers claims about sustainability standards systems, it refers to the actions of the scheme owner itself, rather than the users of standards systems (those making claims about the standards systems, eg, businesses throughout the supply chain).

For users of standards systems, we have compiled a list of regional guides in the section **Additional References** (page 48), and will continue to add resources to the ISEAL website: www.iseal.org/claims

About ISEAL Alliance

ISEAL Alliance is the global membership association for sustainability standards. ISEAL is a non-governmental organisation whose mission is to strengthen sustainability standards systems for the benefit of people and the environment. ISEAL is the global leader in defining and communicating what good practice looks like for these sustainability standards. The four goals of ISEAL are to:

- › Improve the impacts of sustainability standards;
- › Define credibility for these standards;
- › Improve their effectiveness; and
- › Increase their uptake.

ISEAL’s Credibility Principles are particularly relevant to this Good Practice Guide. You can find the list of the principles, and how they relate to claims and traceability in **Annex A**.

Further information about the ISEAL Alliance and its membership is available at www.isealalliance.org

Development Process

The development of this document is being guided by a multi-stakeholder expert Steering Committee and will include at least two rounds of global consultation, in line with the ISEAL Standard-Setting Code and ISEAL’s Code Development Procedure. The Steering Committee will be responsible for signing off on the final content of this Good Practice Guide, with oversight by ISEAL’s multi-stakeholder Technical Committee.

ISEAL is seeking input on the development of this document, and comments will be considered in developing the next draft.

Please submit comments using the feedback form available on the ISEAL website at www.iseal.org/claims

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This document is in consultation, so the page numbers are likely to move about with edits

With this in mind, this contents page uses xx to show a page number present that is to come, so you don't need to tell us. The page numbers will appear correct in the final document.

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How to use this Guide

The suggested practice is presented in table format with a table for each of the following overarching sections.



Section 1 Developing your claims

There is a lot to consider when preparing the permitted claims for your system.

Section 1 outlines the various factors that can affect the claims you permit, and the rules and pre-requisites for their use. Designing and managing your claims is an iterative process, requiring you to make decisions, check their application, then sometimes revising your approach. You should read through the other sections to be fully aware of

whether their implementation will affect the claims you permit.

This section also highlights the value of consulting with your stakeholders as you develop your claims, to improve the quality and accuracy of the claims, and to help ensure that there is common understanding of the intent of the standard, and that this is reflected in the claims.



Section 2 Define the rules for using your claims

In **Section 1** you determine which claims are permitted and in which circumstances. The next step is to define the supporting rules for the use of your claims.

Section 2 is essential to ensure consistency in the use of your claims, which will help to lead to familiarity with your claims, and in your ability to detect misuse of claims.

Section 2 describes how to prepare your rules document and outlines the various sections you should include, such as who is eligible to make a claim, and what steps they must follow to seek approval.

In defining these rules, you may find you need to go back to the previous section and adjust claims, as documenting exactly what is or is not allowed can highlight issues with certain claims.



Section 3 Supporting systems

Section 3 This section describes the various internal systems you'll need to set up to issue, approve, track, monitor and if necessary, withdraw the use of claims about your scheme.

It presents the various systems, and notes where these must be in place right from the beginning, and what can be developed over time. As a minimum it is suggested that you have a system in place to approve

the use of your claims, and to track the permitted users and uses.

Some examples of potential monitoring activities are included, as well as suggestions for what to do when misuse happens by organisations not already engaged with your scheme.

Working with the sections

In each table, the suggested practices are presented, along with further information on suggested approaches and reasons why each practice is important—roughly a **What, Why, Considerations** approach.

The tables are presented like this:

X Section

The **main criteria** listed at the start of the section give you an overview of tasks and the factors to consider.

X.X Main criteria

- › **What** Recommended action: what to do and what part of the system to put in
- › **Why** it's important: things to think about when designing your system, tricky issues to avoid, ideas for how to do it, further thoughts...
- › **Considerations** Things to think about when designing your system, tricky issues you want to avoid, ideas for how to do it, further thoughts...

X.X.X Sub-criteria

- › **What** Recommended action at a more detailed level
- › **Why** As above
- › **Considerations** As above

X.X.X.X Sub-criteria detail

Recommended actions and important issues to consider with desired outcomes and examples.

Section 3 Supporting systems

- 3.1 Legal protection and licensing
- 3.2 Issue claims
- 3.3 Monitor use of claims
- 3.4 Enforcement
- 3.5 System review

3.3 Renewal or reporting procedure

What Determine the type and extent of monitoring that will be undertaken.

Why Having an outline for how your monitoring activities will work gives a basis for the activities to evolve as your system grows, and allows for a clear assessment of whether risks to the credibility of your scheme are being managed.

Planning in advance will help ensure monitoring does take place and allows planning for necessary resource allocation.

Considerations There are various approaches to monitoring the use of claims, and it is important to have an overarching plan for monitoring.

You should ensure that monitoring activities are appropriate with the scale and nature of your claims system and can be adapted as necessary.

Some organisations include the monitoring of claims as part of the assurance process.

This provides valuable information about the claims-making practices of those participating in the standards system, but is less effective for identifying misuse by those not formally engaged in the system.

3.3.2 Monitoring responsibilities

What Determine who will be responsible for monitoring claims.

Why Being clear on responsibilities allows for better planning and managing of expectations.

Considerations You should be clear about the responsibilities for monitoring. You can use various parties to do this (auditors, independent contractors, staff, etc).

You should also consider self-monitoring and reporting, which can be verified in other ways. It can be useful to find ways to

incentivise truthful reporting, through decreased costs, monitoring frequency and other methods.

As an example, you may want to create a facility on your website that allows the public to report fraudulent use of your logo or mark (see 3.3.5).

See more on monitoring in Assurance system monitoring below.

Assurance system monitoring

3.3.2.1 What If requiring assurance providers to play a role in monitoring, include these requirements in your assurance procedures.

Why In order for assurance providers to play an effective role in monitoring claims use, they need to have clear requirements from the outset, to allow them to

Considerations If using assurance providers, include this in the appropriate assurance procedures and be clear about exactly what is required.

For example Should the auditor specifically review all uses of claims, a sample (how large); at each audit; make specific visits to check, etc.

If there is an expectation that this will be handled as a matter of course within the audit, this must be included in the certification procedures (or related document instructing auditors) so that the auditors design their procedures to include this and allow time in the audit.

Claims system guidance



Section 1 Developing your claims

- 1.1 How the set up of your system affects what claims can be made
- 1.2 Permitted text claims
- 1.3 Logos (if applicable)
- 1.4 Access to further information
- 1.5 Consult with stakeholders



Key point The word 'sustainable'

'Sustainable' is a very significant claim that does not have a consistently agreed definition, though there is general consensus that it includes three pillars: **social, economic and environmental.**

Beyond this, asking what 'sustainability' is can result in a big debate, and in some jurisdictions the use of the word has legal and marketing restrictions associated with it. Recognising this, there are two main considerations for you to bear in mind with regard to your claims development.

One is that the word 'sustainable' (or sustainably, sustainability, etc) on its own should normally refer to all three of the generally accepted pillars of sustainability.

It's worth noting that using the word sustainability within your claim without qualification (eg, noting which of the pillars it considers) is likely to

draw criticism from stakeholders unless you can demonstrate that your standard adequately considers all three pillars. The second is that the performance level of your standard would be expected to be very high to claim 'sustainable', again, on all three pillars.

For many standards, these two factors combined would make the standard unachievable, so you should consider qualifying your claim. This means specifying which of the pillars your standard covers, and avoiding using the absolute statements 'sustainable' or 'responsible' without referring to a comparison—eg, 'more responsible' or 'more responsibly produced'. It is also possible to use

these terms in the context of moving toward better practices—eg, 'working toward sustainability'.

Of course, sustainability is a general term that is becoming more and more widely recognised, so if you are considering using it you should provide more information within your claim.

For example, instead of saying 'sustainable tomatoes', you could say 'tomatoes produced using more environmentally sustainable farming methods than the industry norm'.

Other general terms such as 'ethical' should also include qualifying language to help with understanding of the claim.

1.1 How the set up of your system affects what claims can be made

What Consider the different components of your system, and how this will affect your permitted claims

Why Claims made about your system are how most users experience and learn about your standard system.

As such, they need to be consistent with the requirements of your standard and structure of your system and should not be misleading.

Considerations The claims you allow need to be true, accurate and consistent with the rest of your system (outlined below). Additionally, you need to take into account where the claims will be made. The combination of how your system is structured and where you allow claims to be made will inform the types of claims that can be made.

Each of these parameters affects the claims that can be made, but the claim is also affected by considering the combination. Each of these parameters affects the claims that can be made, but the claim is also affected by considering the combination. For example, if your standard assesses best practice, but you have no assurance and no traceability, it is inappropriate to use

the word 'certified'. Alternatively, a scheme owner may have a very robust assurance system, but an entry-level improvement standard—in this case the emphasis of the claim should be on the improvement components and should not over-claim regarding sustainability.

It's important to consider the overall perception that a claim will make (as outlined in the *Guide to Understanding Sustainability Claims*) to avoid creating misperceptions over your claim. Even if the statement is factually accurate, consider whether the impression it creates is truthful.

See more on what constitutes a controlled, assured or marketing claim in Table 1 Types of claims page 10

Where claims are made



Product-related, off product
Promotional poster
'We only use ABC Responsible Coffee'



Product related, On-product
Consumer packaging
'Our coffee bean suppliers are certified as well-managed against the Responsible Coffee Standard'



On-site Factory signage
'We support the ABC Responsible Coffee scheme'



On-site Web page: 'We are a certified ABC Responsible Coffee compliant factory'



1.1.1 End use of claims

What Determine **where** claims will be made

Why The nature of your claim and rules for use will be affected by how and where the claim will be used. Your rules may cover only one of these places where the claim is made.

However it is likely that your scheme will refer to more than one and it's important to consider the different rules and methods for each.

See more on what constitutes a controlled, assured or marketing claim in [Table 1 Types of claims](#) page 10

Considerations

The following list includes the most common places where claims will be made:

Assured claims Product-related

On-product A label or statement printed, stuck or otherwise physically attached to the product or its packaging.

For example Labels, stencils, stickers, descriptions, tags, heat stamps, etc.

Off-product A label or statement referring to the product, but not attached physically on the product or its packaging.

For example Invoice, websites, product-specific advertising, etc.

Assured claims On-site, Entity related

(eg, business, site).

Two examples:

- › Claims of membership (if there are criteria to become a member)
- › Claims of certification/ approval, etc.

Assured claims Standard related claims— non-product and non-site

For example Use of claims on business cards, website, promotional leaflets, etc.

Marketing claims Non-product or certified entity related

eg, corporate commitment claims.

For example 'Plan to source X% by 2025', general website claims, general advertising.

More examples...

You may primarily have an on-product claim that includes a logo and an information statement (Product-related, on-product claim).

However, you may require a chain of custody (CoC) certification in order to use the on-product claim.

The claim regarding CoC certification should also be controlled, and will need to be considered on its own and have separate rules.

The illustration opposite [Where claims are made](#) shows more working examples.

1.1.2 Audience for the claim(s)

What Determine **who** is the intended audience for the claim(s), and ensure consistency with where claims will be made.

Why The level of explanation and type and amount of information of the claim will vary depending on audience type.

If the audience is consumers, you need to consider what the average consumer will understand when seeing your claim.

Considerations Claims generally have one of two audiences:

- › Consumer-facing, including all public facing claims (B2C)
- › Business to business (B2B)

For example

If the claim you are controlling is used to distinguish boxes in a warehouse, you may require less text than for a consumer-facing claim.

However in a product specification sheet where a purchasing decision is being made you may require more information in the claim.

1.1.3 Scope of the standard

What Ensure claims are consistent with the **scope** of the standard.

Why If your claim is broader than the content of your standard it is misleading for the users of your system, which can affect overall support.

Considerations The scope can refer to which of the sustainability pillars your standard is addressing (social, environmental, economic), and the sector and geographies to which the standard applies.

If your claim is not supported by your standard, you should adjust either your claim or your standard to be truthful.

It is likely that both your claims and the standard will evolve over

time—it's worth regularly cross-checking what you'd like to be able to say with the content of the standard. ie, be aware that changes to your standard may affect the claims that can be made.

For example

If your standard only considers the impact on the people in the supply chain, your claim should not give the impression that all three pillars of sustainability have been considered.

1.1.4 Performance level of the standard

What Ensure claims are consistent with the **performance level** of the standard.

Why Some standards are designed to recognise best practice, while others aim to lift the worst performers. The claims resulting from these are very different. As with the scope, claims that promise a higher performance level than the standard delivers are misleading for users.

Considerations Some standards will use words like 'responsible', or 'sustainable' if they are trying to recognise those following best practice.

When the intent is to recognise an improvement from poor performance, or a minimum bar in a poorly performing sector, the word 'better' is often used. If you have an improvement standard, your claim should not be 'best practice' or even 'good practice'. If you have a stepwise standard, consider what

claims will be permitted as the user progresses through each of the steps.

This is an area where consulting on the claim during the standard development process can help to ensure stakeholder alignment with the intent of the standard and the resulting claims.

Some examples of claims associated with different performance levels are included in [Annex D](#).

1.1.5 Assurance model

What Ensure claims are consistent with the **assurance model** of the standards system.

Why The assurance model affects the level of independence of and overall approach to the assessment and this influences what claims can be made.

Considerations Where sustainability claims are being made it is essential that the appropriate assurance programme is in place to provide evidence of compliance.

One common requirement for claims makers (eg, businesses) in legislation is that they are able to substantiate their claims. They must be able to rely on the assurance process to provide the necessary level of rigour. Use of 'certified' in a claim generally refers to the use of a third-party audit that assesses conformance and results in a certificate being issued.

There is also second-party assurance, where a related party verifies assurance, but a certificate would not be issued.

First party assurance, or self-declaration, should not use words like 'independently verified'.

'Meets requirements' is more vague regarding the assurance system behind the claim.

Some examples of claims associated with different assurance models are included in [Annex E](#).



1.1.6 Chain of custody models | *Product related-claims only*

What Assess which chain of custody model(s) your system uses and ensure that claims made under each model are appropriate.

Why For product-related claims, the chain of custody model used has implications for the level of confidence that a product contains certified material, and therefore affects the type of claim that can be made.

The claim needs to not overstate the model.

Considerations The claim made should be appropriate for the supporting chain of custody (CoC) model and/or traceability system required by the scheme owner.

Some schemes permit different CoC models which result in different claims. Note a combination of models may also be used through the supply chain¹.

The nature of your CoC model may also affect where the claims can be made, for example with weak or no traceability you should not use an on-product claim.

If you permit claims from more than one chain of custody model, you should clearly state which are permitted for each.

¹See [Annex F: Chain of Custody models and related claims for more information, and recommended good practice claims for each model](#).

1.1.7 Legal regulations

What Identify any legal regulations in countries where you intend for your claim to be made.

Why Your users will expect that you have checked the legal permissions for claims in their proposed region, and you should avoid inadvertently allowing an illegal claim.

Though you can make it their responsibility, you will still be held accountable by users.

Considerations In some countries there is legislation that prevents making statements that cannot be verified or substantiated, so permitting claims that are not truthful or cannot be verified could result in a user of the standard, or the scheme owner itself being charged or sued.

In addition, certain words such as 'standard', 'certified', and 'sustainable' are controlled in some countries. For example, using the word 'certified' (*certifié*) in France is strictly limited to certification schemes that are accredited by an agency approved by the French government. There are other considerations, for example in Germany, the use of asterisks within the list of ingredients is against the law (which makes it harder to indicate which ingredients are actually certified in a product with only some certified ingredients).

In some countries, even registered logos or trademarks have to be provided in the national language². For example, language laws in Canada requires labels to be presented in both official languages (English and French).

You should identify the main countries where you expect for your claim to be made, and check whether there are any issues with your intended claim. You should check all translations you intend to use, in each relevant country.

You should add a disclaimer that says that the user of your claim should check that it is legally permitted for their proposed use, but acknowledge that they will expect that the scheme owner has done due diligence on this anyway.

²[Personal communications from standards systems: comments and specific examples welcome](#).

1.2 Permitted text claims

What Prepare a clear list of permitted text claims, taking the parameters in Section 1.1 into consideration.

Why Thinking through the different scenarios and combinations of parameters will inform your permitted text claims, and may inform the design of your system.

Considerations You may wish to have several statements to allow users to choose their desired options. Remember that the more consistent the statements and claims, the more quickly recognition and understanding are built. However, also note that such lists can rarely be exhaustive, and that statements will sometimes need to be considered on a case-by-case basis.

You may also wish to provide different minimum information statements depending on the use—for example, on a tiny product it can be difficult to present all the components of the desired statement. In this case you may wish to require fewer words, but a larger reference to additional information.

It is important to find the right balance, but always ensure that each permitted statement is accurate, truthful, can be substantiated, and is not misleading.

In particular, if you use more than one chain of custody model, you should clearly state which text claims are permitted for each.

Remember you may need to prepare a different set of text claims for your different standards or different chain of custody models. [See Annex F.](#)

There are also sometimes different sets of text claims depending on the user—for certificate holders and non-certificate holders.

Some text claims cannot be used without logo and maybe also the URL or link to additional information.

Many scheme owners also permit requesting approval for custom text claims. If you permit this be clear about how approval will be handled internally, and decisions made for difficult proposals.

For examples of text claims see Annex C.

1.3 Logos (if applicable)

1.3.1 Logo applicability

What Determine whether you will permit a logo to be used to make a claim.

Why Implementing a logo based claim has additional considerations that you should be aware of before choosing that model.

It's important to make a conscious decision if you plan to use a logo, and be clear that it fits into your theory of change.

Considerations If you are planning an on-pack consumer facing claim the most common way to deliver this claim is using a logo or ecolabel. Labels are increasingly recognised by consumers as highlighting social, environmental and/or economic performance of products.

Some standards systems operate B2B systems and choose to not use a logo. Consider that on-product consumer-facing logos require additional or more intense controls, such as regular approvals,

considering the claim in context (ie, what overall impression does the packaging give), awareness raising with the public to add value to the logo to increase its uptake, and more.

You can also use a logo for a B2B system, for example on websites or on product specification sheets, or even on-product. In a B2B scenario, however, it is less likely that a purchasing decision will be made as a result of an on-product logo, so you may choose to have different, possibly less restrictive rules for the use of logos on B2B products.



1.3.2 Logo design

What Design your logo to ensure that it accurately reflects the meaning of the standard.

Why Most customers will look primarily at a logo so its meaning needs to be easily understood and an accurate representation of your system.

Considerations If you are planning to use a logo or ecolabel it is worth considering what this will look like from an early stage (eg, for an environmental standard it should not show smiling people), taking into account all of the other factors for consideration in this document.

As you are developing your standard you are likely to come across logos

from other organisations, giving you a sense of what will stand out.

There are helpful references in some of the regional guides (eg, *FTC Green Guides*, or Defra's *Green Claims Guide*) about imagery that could be helpful.

See [Additional References](#), page 48

1.3.3 Test the design

What Test the ability for others to understand the logo and to determine whether it is commonly understood.

Why Customer testing provides useful feedback on how your logo is likely to be interpreted, which helps to ensure that your logo is not misleading.

Considerations You should use various approaches here

For example

- › Focus groups
- › Contract on-line survey providers
- › In-person interviews

Ensure that you are reaching a wide cross-section of potential users and possible geographies, particularly if you are intending to use a logo

or ecolabel to drive consumer behaviour when it is essential to get independent feedback about your proposed design.

It's important to remember that in general consumers are making quick decisions, are likely to be less informed about the related sustainability issue and need to have clear, understandable information conveyed to them.

1.3.4 Legal protection

What Determine whether you will be able to obtain the necessary legal protection for your logo/ecolabel.

Why As your standards system and logo gain traction, it will be important to have legal rights to its use so as to prevent misuse.

Note If you are considering including wording within your logo, also remember that you will likely need to register different translations and versions of the logo.

See [1.1.7](#) for other legal considerations.

Considerations One important aspect in controlling your claim is ensuring you have the legal right to do so. Trademark registration can be time consuming and expensive, so it is worth a full investigation of whether it will be possible for you to register your proposed logo before progressing too far with it (eg, in designing related organisational branding documents).

The main reason you may not be able to register your logo would be similarity to another already registered logo. A good approach is to search for related organisations, similar names, organisations with the same acronyms or abbreviations, in as wide a range as possible. Many related organisations will have been identified during your needs assessment in

standard development, so tracking the logos used by related systems is useful to do systematically during that process.

At this stage, you should also consider which claims you may like to register. All forms of claims can be registered including logos/ecolabels, abbreviations (eg, FSC, MSC), and text claims (eg, Just Do It © Nike), for the relevant categories.

If your claim is generic it can be difficult to register (eg, certified sustainable), however if you integrate the words within a graphic logo it can make it easier to register. However, remember that generic claims are less meaningful to users, so you should use these with additional supporting text to provide a clearer claim.

1.4 Access to further information

What Define the required supporting information that must be linked with the claim, and the circumstances under which it needs to be displayed.

If there are different requirements for different contexts, ensure this is clear.

Why Supporting information provides users with additional knowledge about the certified product or service beyond what can be displayed at the point of making the claim. This can be used to explain and substantiate the claim for those who wish to find out more.

Remember
Understanding a claim should not just be 'possible', it should be **easy**

Considerations The idea of a claim is to summarise a complex set of activities into a short, easy to understand statement or picture. However, it is important that accuracy is not sacrificed, and that those wishing to seek additional information have easy access to it.

A credible claim is one that conveys a simple, clear message, but also offers the user the ability to find additional information if desired. To achieve this, the minimum that must be apparent is the name of the organisation about which the claim is being made. Having the name of the organisation means that at the very least an internet search can provide further detail if necessary. You may also consider including the name or number of your standard, if you have more than one.

If requiring the display of a web link to additional information, you must ensure that the information is easily accessible when the user follows the link. If space allows, you could consider providing a specific URL rather than the general organisation link. If not, or if your product will stay in circulation for longer than the webpage will exist, ensure that the home page either provides the information about what the claim means, or clearly directs users to the appropriate information.

Many organisations will use a short but accurate text claim and provide a web link to direct users to more information. There are various other ways of providing more information, for example providing point of sale information. For users, including consumers, the most helpful approach is to provide sufficient information with the claim or logo itself. Consumer research shows that less than 10% of consumers will seek additional information¹, so it is important to provide clear information as part of the claim,

and not be misleading such that the claim is only clear when accessing the additional information.

Space to present the claims can be a challenge, so being concise is important. There is a size consideration concerning room for printing (for example, the use of a sustainable wood logo on a pencil compared to a piece of timber), so it is important to consider the variation of products and make it clear what is permitted, and how decisions are made.

Online, there is an opportunity to present additional information where it is easy to click through to an appropriate link, either to the scheme owner's website or to bespoke information on the user's site.

When determining which means will be acceptable for providing additional information, consider whether it is optional or required. For example, if you are requiring point of sale material, consider how you will monitor that it is always included. This may be possible in the certification process, depending on how your system is designed.

In a B2B environment, the access to additional information becomes more significant, because the specific claim itself can often have less influence in an immediate purchasing decision. For example, for the specific text claim for a B2B interaction you may require shorter text claims but a longer or more specific link to access further information.

Internally within the business, consider the use of a company's intranet to train employees, and what the rules are around that use.

¹Globescan consumer research. 2012. www.globescan.com/component/edocman/#download-modal-content

1.5 Consult with stakeholders

What Make the intended claim(s) available for stakeholders to provide feedback.

Why Even in draft form, providing these helps to ensure that there is common understanding of the intent of the standard, and better inform stakeholder participation in standard development.

Considerations Getting stakeholder feedback on the intended claims can be done as a separate exercise, or can be included in the standard development process. It can also be included even earlier, during the needs assessment step of the standard development process.

One option is to include potential claims in your terms of reference document for developing your standard.

Getting feedback from stakeholders is mostly relevant for text claims—what you are intending users to be able to say they have achieved as a result of meeting your standard.

In consulting, be clear about how decisions will be made about amendments to the claim.

You may decide not to consult if you change the claim(s), but this should be clear from the beginning. This can also include asking for input on logo design at the same time, if applicable.

There is information about stakeholder mapping and consultation in ISEAL Standard-Setting Code, available on ISEAL's website: www.isealalliance.org/our-work/defining-credibility/codes-of-good-practice/standard-setting-code



Table 1 Types of claims

Supply chain stage	Assured claims Certificate claims	Assured claims Product-related claims	Marketing or promotional claims
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<p>Production, services or extraction</p> <p>For example Rice, gems, sustainable tourism</p> 	<ul style="list-style-type: none"> › We are certified to the ABC Standard for using responsible practices to produce blob › ‘Our management is...’ › This site is certified for responsible blob practices 	<ul style="list-style-type: none"> › This product comes from ABC Certified sources, which shows that blob has been responsibly produced 	<ul style="list-style-type: none"> › We stock/offer ABC Certified blob
<p>Processing or manufacture</p> <p>For example Processing of raw materials, or manufacture of a product or component</p> 	<ul style="list-style-type: none"> › We are certified to provide blob from ABC certified sources. 	<ul style="list-style-type: none"> › This product comes from ABC Certified sources, which shows that the blob has been responsibly produced 	<ul style="list-style-type: none"> › We stock/offer ABC Certified blob › We support certified production of y amount of blob through the purchase of y certificates › Ask for ABC certified products
<p>Trading</p> 	<ul style="list-style-type: none"> › This product comes from ABC Certified sources, which shows that blob has been responsibly produced › We are chain of custody certified to offer ABC blob 	<ul style="list-style-type: none"> › We are certified to provide blob from ABC certified sources › We are chain of custody certified to offer ABC blob 	<ul style="list-style-type: none"> › We stock/offer ABC Certified blob › We support certified production of x amount of blob through the purchase of y certificates
<p>Final manufacture (if different)</p> 	<ul style="list-style-type: none"> › We are certified to provide blob from ABC certified sources. (If necessary) › We are chain of custody certified to offer ABC blob 	<ul style="list-style-type: none"> › This product comes from ABC Certified sources, which shows that the blob has been responsibly produced 	<ul style="list-style-type: none"> › We stock/offer ABC Certified blob

Table 1 Types of claims *(continued)*

Supply chain stage	Assured claims Certificate claims	Assured claims Product-related claims	Marketing or promotional claims
<p>Retail</p> 	<p>Be clear whether certification is necessary at this stage in the supply chain – if so: ‘We are certified to provide blob from ABC certified sources’. <i>(If necessary)</i></p> <ul style="list-style-type: none"> ➤ We are members of Association x 	<ul style="list-style-type: none"> ➤ This product comes from ABC Certified sources, which shows that the blob has been responsibly produced ➤ We procure enough certified x to produce blob ➤ We support certified production of x through the purchase of y certificates ➤ We support certified production through providing funds for/to... 	<ul style="list-style-type: none"> ➤ Visit our stores to find ABC Certified blob ➤ We stock ABC Certified blob
<p>Food service</p> 	<ul style="list-style-type: none"> ➤ We are certified to provide blob from ABC certified sources. <i>(If necessary)</i> ➤ We are chain of custody certified to offer ABC blob 	<ul style="list-style-type: none"> ➤ We support certified production of x through the purchase of y certificates ➤ We are members of the Association x ➤ All of our blobs in-store have ABC certification ➤ Flag the certified products on offer in menus, vending machines, etc. ➤ We procure enough certified x to produce blob 	<ul style="list-style-type: none"> ➤ Visit our restaurant to find ABC Certified blob ➤ We stock ABC Certified blob



Section 2 Define the rules for using your claim(s)

- 2.1 Rules for applying claims
- 2.2 Display requirements for claims
- 2.3 Fee structure for the use of claims
- 2.4 Claims and logo use approval process
- 2.5 User guide and supporting documents



2.1 Rules for applying claims

Section 2.1 includes considerations for setting rules for within your claims system. Some of these are linked to the parameters outlined in [Section 1](#).

[Sections 2.1–2.4](#) are included here to help provide an overarching structure for what your user guide and supporting documents (see [2.5](#)) will contain.

2.1.1 Who can make claims

What Define who is eligible to make each of your claims.

Why This ensures that claims made by each user are appropriate for their role.

Considerations Consider whether you will have different types of claims makers, and be explicit about what claims each user type is able to make, and the related procedures that are necessary.

For example Certified enterprises along the supply chain may be able to make claims that would be quite different from claims made by retailers to end consumers.

2.1.2 Pre-requisites for requesting approval to make a claim

What Determine the pre-requisites that potential claims-makers need to meet before they can request approval to make a claim.

Why This ensures that potential users are clear about what needs to be in place before they can apply to use the claim and will help to avoid confusion and disappointment.

Considerations This may include that, before requesting permission for use of your claim, they:

- › have met a standard; or must be certified for chain of custody;
- › must source from a certified supplier;
- › must have formal approval of membership (or other type of approval)

- › have the ability to sign a license agreement (and eventually, do sign);
- › have paid the necessary fee (if applicable); and
- › have taken into account other requirements you determine (such as submitting the packaging or material bearing the logo and/or claim for review in advance).

2.1.3 Minimum content or activity requirements (otherwise known as ‘percentage-based claims’)

This sub-section covers the various types of percentage-based claims, from a single ingredient product to the product range of a whole business. In general, it does not prescribe minimum percentages, or set limits or rules, but instead outlines the

various considerations that should be taken into account when setting rules for each type of percentage-based claim. These will vary significantly by sector, audience, nature of the standard and chain of custody models used.

What Determine the minimum percentages of certified product content or activity that is required under different circumstances.

Why You will likely be faced with questions about ‘how much is enough’ to be able to use a claim.

This is one area that is incredibly emotive, particularly for consumer facing claims, as the rules here can really affect the trust in a scheme owner’s claim.

Note Section 2.13 refers to ‘ingredients’ but this is a catch-all for all inputs.

Considerations Section

2.1.3 covers the various types of percentage-based claims, from a single ingredient product to the product range of a whole business. In general, it does not prescribe minimum percentages, or set limits or rule, but instead outlines the various considerations that should be taken into account when setting rules for each type of percentage-based claim. These will vary significantly by sector, audience, nature of the standard and chain of custody models used.

This is an area where stakeholder consultation and landscape mapping of similar initiatives is very important, and seeking the perspective of the user is essential. There are several considerations when determining the rules when allowing less than 100% claims, including:

› **Consumer perception** Consider the impact of using a logo on the front of a consumer facing pack, to have the consumer find on further inspection that the certified ingredients only makes up a tiny proportion of the overall product. If choosing

to permit this, you could add additional requirements to explain why. Or have limits for logo use related to percentages: below a certain percentage the logo can be used, but on the back of pack, or just have the text noted in the ingredients, or just the text claim but no logo.

- › **Impact of the ingredient** One reason you may allow a small percentage is that ingredient/ commodity has a big impact. If this is the reason, it really helps to provide additional information that explains this to the user.
- › **Feasibility of achieving 100%**
- › **Availability of product** Not all ingredients for a mixed product may be available in certified form but you may still wish to use the logo
- › **Nature of supply chain** For whole products this can be more achievable, however for certain commodities the nature of the supply chain can mean it is very difficult to maintain 100% separation without adding excessive costs.

Percentage-based claims

2.1.3.1 What Certified content of a single ingredient Determine whether claims can be made for a percentage of a single ingredient, where there is more than one source of the same ingredient

Considerations This relates more to the rules regarding your CoC model (eg, a single ingredient product that has a percentage from certified sources, or a percentage claim resulting from a known percentage blending CoC model).

Percentages for products which are blended (eg, certified and non-certified) should also be considered, and refer to Annex A.

Some organisations have different rules for different scenarios, for example where the single ingredient is from certified and non-certified sources the logo can only be used with the percentage being stated, or if there is not a certain minimum then words can be used to recognise an ingredient, but not a logo.

2.1.3.2 What Multi-ingredient products with one eligible ingredient Determine the minimum percentage content required for claims about assured single ingredients in multi-ingredient products

Considerations Minimum percentage considerations can refer to an ingredient or part of a product.

For example

A seafood ready meal that only has one seafood ingredient, and this has met the seafood standard (which is the only ingredient the standard applies to in this case).

You need to decide whether there is a minimum percentage of the weight of the product you require before a claim can be made, or whether you will allow conditional requirements,

such as where there is no similar ingredient contained in the product.

You should also consider qualifying the claim, so that it reads 'the seafood ingredients in this product...' rather than appearing to apply to the whole product.

For some sectors there is local legislation that it is worth considering. Based on FTC guidance in the US for example, it's not permitted to say recycled content unless the product is made entirely out of recycled material, otherwise you have to specify the percentage.

2.1.3.3 What Multi-ingredient products with more than one eligible ingredient Determine the minimum percentage content of certified ingredients in a multi-ingredient product that is required for claims.

Considerations This is particularly relevant if your scheme covers a product that is often an ingredient, or where it cover multi-ingredient products. Examples might be organic sauces where most of the ingredients are produced organically but some are either not available as organic (eg, water) or the organic version was not sourced for this product. You should be clear what percentage of ingredients must be certified in order to use the claim about the whole product, or whether all possible products must be sourced to use your claim.

In the Seafood ready meal example above, regarding products with one eligible ingredient, you should be clear whether your claim is permitted when there are two seafood ingredients and only one has met your standard.

Various approaches are taken on this, including not permitting the use of a label, but recognising the ingredients that have met the standard in the list of ingredients, and providing further information, but on the back of the packaging.

Percentage-based claims (continued)

2.3.1.4 What Overall range of products or activities Determine whether partial claims can be made for companies where only part of their production or activities or sales are certified.

Why This addresses the strongly held belief of consumer organisations that there is huge potential for greenwashing if an entity promotes participation in a scheme but only where a tiny percentage of their line is covered, or where no effort is shown to increase certified content.

Considerations Some schemes cover this while others don't. This can be defined in various ways—percentage of sales, product lines, volumes, etc.

It is important to take the user perspective here in particular and to find an appropriate balance. Consider the impact of users (usually consumers) perceiving higher performance than is actually being practiced and potential lack of incentive for improvement.

Conversely, it is also important to enable use of claims, so requirements that are too high or restrictive can

limit uptake of your standards system altogether.

Considering how a consumer would perceive the claim, and whether it comes across as truthful, is a good starting point. It can help to require that users are as specific as possible about their claims, for example that they state the current percentage of their progress towards a 100% goal.

These types of claims are generally inappropriate and misleading to make on-product and should be limited to company websites and other communications materials.

2.1.4 Stating the percentage

What Require that the percentage of certified product (or ingredient or component) should be stated within the claim, where known.

Why Different schemes permit different percentages. Stating the percentages provides transparency and informed decision making. This also leads to trust in the system.

Considerations In some systems and approaches, it will be difficult to know the exact percentage. In that case, claims can state 'at least' a certain percentage.

It is only when using 100% certified content/processes, etc, that the percentage does not need to be included, though including it adds clarity to the recipient of the claim.

More suggestions are included in [Annex F](#) related to this.

2.1.5 Chain of custody limitations | *Product-related claims only*

What Clearly state which claims are permitted for each chain of custody model.

Why Particularly in systems where more than one chain of custody model is permitted, it is essential to be very clear about which claims are permitted for each model to ensure consistent use and uptake.

Considerations If your system permits different chain of custody models, the claims should be distinct, or should defer to the applicable CoC model with the least ambitious claims, eg, 'supports'.

See [1.1.6](#) and [Annex F](#) for more info.



2.1.6 Where claims can be made

What Clearly state where each claim or type of claim can be made.

Considerations Determine who is the intended audience for the claim(s), and ensure consistency with where claims will be made.

See 1.1.1 Determine where claims will be made and 1.1.2

2.1.7 Rules for applying the logo or ecolabel

What Consider whether there are additional pre-requisites or rules specifically for logo use.

Considerations You may have different rules for applying the logo than you do for text claims. For example, you might require a higher percentage of certified content, or only permit certain types of chain of custody before permitting logo use.

If using a stepwise or improvement programme, you may require participants to have progressed to

a certain level before using the logo on pack.

Many systems make a special note about approving the use of the logo in context, and reserving the right to refuse approval if the logo is positioned on packaging alongside claims that may be considered greenwashing or misleading in another way.

2.2 Display requirements for claims

What Determine the display requirements for all of your claims.

Why Consistent display of claims leads to greater recognition and a greater ability to distinguish incorrectly displayed and potentially fraudulent claims.

Considerations You will likely receive requests for exceptions due to space limitations or other reasons. This is covered in more detail in [3.2.1.2](#).

It's important to be clear about how exceptions are handled and as much as possible plan for those that you can expect. This will save time in decision making, and will help with consistency.

2.2.1 Display requirements for logos or ecolabels

What Determine the requirements for how logos are to be displayed.

Considerations Display requirements will likely include some or all of these:

- › minimum size of a logo
- › colours and permitted adaptations
- › location of claim (eg, front of package, displayed in store or office)
- › background colours
- › exclusion zone (distance from other claims / clear space)

It can help to provide visual examples of acceptable and incorrect uses

of logo placement, size, colour, etc. Sometimes the minimum (or maximum) sizes of logos, or the distances from other claims are presented as a percentage of the size of the packaging, or the logo.

So you may wish to say that other logos must be at least 50% of the size of your logo away (ie, exclusion zone must be 50% of the size of your logo), and that the logo cannot cover more than 20% of the area of the front of the product.

2.2.2 Display requirements for text claims

What Determine the requirements for how text claims are to be displayed.

Considerations Display requirements do not just relate to logos.

You should also include display requirements for required text claims, such as minimum font size (depending on use).

Display requirements will likely include some or all of these:

- › required font
- › minimum font size
- › colours and permitted adaptations
- › location of claim (eg, front of package, back of package, displayed in store or office)

An example of an exception for text claims is with regard to font size, so you may wish to include qualifiers such as 'as long as legible' or similar.

2.2.3 Display requirements for providing access to further information

What Determine the requirements for how additional information needs to be displayed when it accompanies logos and text claims.

Considerations

Display requirements will likely include some or all of these:

- › required font
- › minimum font size
- › colours and permitted adaptations
- › location of link to further information (eg, in relation to logo or text claim)

2.3 Fee structure for the use of claims

2.3.1 Determine financial model for use of claims

What Determine whether there will be a financial arrangement linked to the use of your claim, and how it will be charged.

Why A fee structure for the use of claims provides income to the scheme, but it is important to set up systems to ensure impartiality in decision making regarding compliance with the standard and rules for use of claims.

Considerations Some organisations charge only for the use of certain claims or in certain scenarios (eg, on-product consumer facing logos). Other organisations have a certificate fee linked to the claim of being certified. Another approach is to pay for the physical labels that will be attached, or the charging of administration fees.

Others charge a membership fee, but do not charge additionally for use of claims.

Most fees recognise the size of the user or the volume of the use of the claim in some way (ie, charge less for smaller users, or users who do not use the claim for a large proportion of their sales).

Consider the links to your assurance structure and membership structure (if applicable).

There are many models and it is worth investigating what others are doing.



2.3.2 Communicate financial model

What If charging for the use of an ecolabel or claim, provide transparent and accessible information about how the charges apply.

Why Having access to this information helps users to decide whether they want to apply the claim, and helps to fulfil the Transparency and Accessibility Credibility Principles.

Considerations Many organisations include information about their licensing fee model in their overview document about the rules for logo use.

Others have a separate place on the website to communicate about this.

Some require users to register their details before the information is shared, often in a document download.

Regardless of the approach, public access to this information is critical to lending trust to a system.

At minimum, the fee structure must be clear and transparent to the user prior to them entering an agreement.

2.4 Claims and logo use approval process

What Determine the approvals process for the use of claims and/or the logo, and develop the procedure for this, along with other supporting procedures.

Why An essential element leading to compliance with your requirements is users knowing how to request permission for use.

Considerations Pre-define and publish your approvals process, outlining the steps to follow for those requesting permission to use claims.

It is helpful to manage expectations regarding timeframes for approval, and you should be clear that packaging, promotional materials, etc, should not be finalised or printed before approval is granted.

For example

A simple approvals process could be:

- 1 Sign license agreement
- 2 Pay fee

- 3 Submit design for approval, using approval request form (provide link)
- 4 'Within x days, expect a response from us'
- 5 If approved, proceed with use. If not, adjust design as necessary and re-submit...
- 6 'Within x days, expect a response from us...'
- 7 If approved, approved use will then be recorded, and where applicable, published (eg, added approved uses list on the scheme's website).

2.5 User guide and supporting documents

Over time ISEAL will be making various documents available on the ISEAL website. You will be able to find examples of various documents at www.iseal.org/claims

2.5.1 Develop a user guide

What Prepare and make publicly available user guide that describes the rules for applying for and using claims and logos related to your scheme.

Ensure that each use and user identified is addressed (eg, consumer-facing and supply chain/B2B claims) either in one document or with separate documents.

Why A user guide helps users of your system to be clear about what is permitted and what is required. This can lead to fewer instances of unintentional misuse, and can also empower others to help to monitor your system.

Having this document available allows users of the systems to find their own answers, which can save time for the scheme owner and improve internal communication.

Thinking through various scenarios of use will be important to achieve consistent and avoid ad hoc decisions that can lead to undesired use of claims or inconsistent responses to queries.

Considerations Many organisations issue a 'User Guide' which clearly presents the permitted logos, text claims, requirements for access to further information, conditions for use and approval procedures in one document.

It will also be one of the most valuable documents you create and is therefore highly recommended. The challenge is to make it clear and complete, but usable, so that it is not overwhelming.

Note that this document will evolve over time as new scenarios are encountered. Be sure there is a system in place to record exceptions, new decisions, etc to allow for an informed, consistent and complete revision of the requirements for use. But be aware that users can become frustrated if the guide is updated too frequently, ie, more than once every 1–3 years.

Version control is also important, so users are sure that they are working to the most recent rules.

At minimum, the document should contain the following information:

- › Who is able to make claims
- › Pre-requisites (conditions under which claims can be made)
- › List of permitted claims. See [1.2](#)
- › Rules for applying claims:
 - *Minimum information/text, links to relevant additional information*
 - *Display requirements: Colours, size of logo/text, location of display (eg, front/back of pack)*
- › Criteria under which claims can be made (eg, minimum percentages)
- › Link to Chain of Custody models (minimum content for claim)

You should also consider including the approvals process within the document, or provide this separately. Usability for the potential audience should guide your decision.



Section 3 Supporting systems

3.1 Legal protection and licensing

3.2 Issue claims

3.3 Monitor use of claims

3.4 Enforcement

3.5 System review



3.1 Legal protection and licensing

3.1.1 Legal protection

What Obtain the necessary legal protection for your logo and claims.

Why Having legal ownership of your claim allows you to prevent misuse and therefore protect the integrity of your claim.

It also allows you to charge for the use of your claim, if that is the business model you choose to use.

Considerations Trademarks can be registered in specific countries, regions or globally, for specific categories or more broadly. In general, the broader the scope of the registration the more expensive the costs, so you may wish to start with a limited scope then expand as your organisation grows in reach and your claim grows in value.

Trademark registration can also require proof of use before the registration is approved, so consider investigating just the feasibility of registering your trademark, then create and begin using it, and then apply for the trademark registration

3.1.2 Licence agreements

What Prepare a license agreement that users will be required to sign before being able to make claims or use the logo or registered claims.

Why To maintain your legal right to own a trademark, you are required to control its use. Therefore, if you are permitting the use of your registered trademark, you must require a signed license agreement for its use.

Considerations To control the use of registered trademarks, many organisations use a licensing agreement which must be signed by claims makers and then renewed or revised periodically.

This renewal process allows for changes to the license agreement at key stages. You should note clearly which changes are being made in this case, and know how you will highlight these changes.

Another way to achieve this is to reserve the right to cancel an agreement and issue a revised one as necessary.

It is useful and necessary to obtain legal advice in preparing your license agreement, to ensure that you are taking adequate control and are protected in the case of misuse.

3.2 Issue claims

3.2.1 Claims review and approval process

What Develop your internal procedure for reviewing and approving the proposed use of claims.

Consider some of the factors under this clause. For each of these, ensure that the relevant people are aware of the rules internally.

Why There are many steps involved in controlling claims and having a prepared checklist can help to avoid missing steps.

Considerations Use an internal checklist for approvals, which may include:

- › Check completed that user meets criteria
- › Issue license, file
- › Issue invoice (if appropriate)
- › Record approval

Be clear about responsibilities for each step, and for tracking the procedure.

If not managing this internally, be clear about expectations for your approvals provider for reviewing and approving the proposed use of claims.

See [Developing a review and approval procedure](#) below

Developing a review and approval procedure

3.2.1.1 What Decision making Define decision-making responsibilities at the scheme owner level for approving the use of claims.

Why Your system can be more efficient and consistent if you are clear who has decision making responsibilities and what process should be followed.

Considerations Regardless of how many scenarios you predict and design rules for in advance, some interpretations will be required.

Many organisations have staff responsible for regular approvals of claims use and then a wider or more senior group that makes decisions where a precedent is being set, or where an exception is being

requested.

If not managing approvals at the scheme owner level, be clear what is expected of your approvals provider, and in which scenarios they are required to consult with you.

3.2.1.2 What Exceptions and new cases Put a system in place to record exceptions, new decisions, etc to the previously agreed rules.

Why Having this system adds efficiencies by not requiring decisions to be made more than once.

It also allows an informed, consistent and complete revision of the requirements at the next appropriate time.

Considerations You should record the detail of the exception, how it applied, whether it was for a limited time, etc.

You should also record the reasons for the exception or the factors that were considered in making the decisions, to allow more consistent and replicable decision-making in the future and to empower more staff to make informed approval decisions.

Developing a review and approval procedure (continued)

3.2.1.3 What Unique

identifiers Put a system in place to assign unique identifiers for the use of claims, appropriate to the scale of the use and nature of the standard.

Why Unique identifiers can help to track approvals and rights for use. They help identify the origin of the claim, and contribute to your monitoring and evaluation systems.

Having unique identifiers can help to manage product redesigns and avoid double counting, or to track different businesses using your system, even if they relocate.

Considerations Unique identifiers include any identifiers that are unique among all identifiers used for that specific object and for a specific purpose. In many cases, a single object may have more than one unique identifier, each of which identifies it for a different purpose.

In standards systems, these are usually generated in two ways:

- › serial numbers, assigned incrementally
- › names or codes allocated by choice which are forced to be unique by keeping a central registry

For example, in some cases the unique identifier will be specific for a certain product line, in others a product or crop type, in others a business. There can also be unique CoC codes, bale/batch numbers, license code that differentiates between certificate holders and non-certificate holders, etc. Regardless, all uses of controlled

claims should be recorded and traceable to the appropriate source.

Unique identifiers can be site specific, such as an address for location. They do not need to be complicated, just appropriate for the system and level of traceability.

It can help to consider the information you might need in future when setting up the system.

For example

- › Will you want to report on number of unique products approved for use?
- › Or the number of unique users?

Using unique identifiers can add work at the beginning, so it's important to think about the scale and intensity of your approach.

It can be difficult to add requirements and put new systems in place once the programme is running, so this needs to be balanced with considerations of system set up.

3.2.2 Data management system

What Prepare a database for recording claims-related activity, license agreements, approvals issued, etc.

Why A database provides an easily accessible register of claims-related activity, which may be useful in cases of fraud or to track types and volumes of claims. It can also be very valuable for monitoring and evaluation purposes.

Considerations Even if starting small it is important to think ahead about how you will record information related to the management of your claims.

The information you will need to record will depend on the level of your approvals.

It is likely that at a minimum you will need to record

- › the organisations you have granted approval for use,
- › the permitted scope and detail of each use (whether this is for a specific product, product category, online use, etc), etc.

For future monitoring and evaluation purposes you should systematically track additional information about the approval.

For example

- For products you might record
- › product type
 - › other product characteristics, eg, species (if relevant)
 - › weight
 - › other logos/claims on the product, etc)

Like unique identifiers, the data management system should be appropriate for the scale of your system.

3.2.3 Approved users and uses

What Publish information on actual approved uses of claims, including, as appropriate, approved users of claims (sometimes called licensees) and their specific approved uses (eg, products).

Why This increases transparency but also offers opportunities for stakeholders to identify incidences of misuse.

Considerations This refers to actual approved uses of the claims, for example recording that it was used for X-brand chocolate bars, in the UK, in 50g sizes, or a list of approved certificate holders, or widgets that have been granted approval to use your logo. It is useful to have this information available as close to 'real time' as possible. It can be useful to link your approvals database to a display on your website. Consider what level of approvals your stakeholders would

find most useful to see published. For example, it can be helpful to see which products or businesses have had approval to make claims, but each approved use (eg, in marketing materials) may not be helpful.

In some cases approved 'users' rather than uses will be more appropriate to share, for example where a user has proven themselves or for certain types of uses. In any case, the extent of the permission should be clearly presented.

3.2.4 Renewal or reporting procedure

What Develop and implement a procedure for the renewal of permission to use claims, if desired.

Why Users of the system will be required to regularly consider their compliance with requirements and are aware of any changes to conditions.

Considerations When issuing approval you should be clear whether it is time bound, and whether regular reporting of use is required.

You can require a renewal procedure, or reserve the right to cancel the agreement and reissue with revised conditions.

Either way, it is important to be able to communicate changes to your systems.

Regarding whether regular reporting is required—this is particularly important if there is a fee associated with the volume of use of the claim. If there is a payment associated with the use of the claim, it is usually collected at this time.

3.3 Renewal or reporting procedure

What Determine the type and extent of monitoring that will be undertaken.

Why Having an outline for how your monitoring activities will work gives a basis for the activities to evolve as your system grows, and allows for a clear assessment of whether risks to the credibility of your scheme are being managed.

Planning in advance will help ensure monitoring does take place and allows planning for necessary resource allocation.

Considerations There are various approaches to monitoring the use of claims, and it is important to have an overarching plan for monitoring.

You should ensure that monitoring activities are appropriate with the scale and nature of your claims system and can be adapted as necessary.

Some organisations include the monitoring of claims as part of the assurance process.

This provides valuable information about the claims-making practices of those participating in the standards system, but is less effective for identifying misuse by those not formally engaged in the system.

3.3.1 Risk analysis on use of claims

What Prepare a risk analysis to determine the conditions under which misuse of the claim is likely, and to inform you where to focus monitoring and surveillance efforts.

Why Understanding where the risks of misuse of claims lie will help you to target your monitoring efforts. It will also help you prepare appropriate mitigating actions like increased training or resources.

Considerations As you develop your permitted claims and rules for use you will be doing a regular risk analysis, even if informally.

Over time it will be valuable to consider developing a formal risk analysis, considering the following points.

- › Certain types of claims use are more risky, for example in new regions where your claims are less established, or where your claim has more awareness and therefore greater value, etc.

- › One factor that significantly affects the risk of misuse is the degree of clarity in your documents regarding rules for use, so there are opportunities to prevent misuse by publishing clear documents.

You should consider making documents available in different languages to aid understanding of your requirements.

3.3.2 Monitoring responsibilities

What Determine who will be responsible for monitoring claims.

Why Being clear on responsibilities allows for better planning and managing of expectations.

Considerations You should be clear about the responsibilities for monitoring. You can use various parties to do this (auditors, independent contractors, staff, etc).

You should also consider self-monitoring and reporting, which can be verified in other ways. It can be useful to find ways to

incentivise truthful reporting, through decreased costs, monitoring frequency and other methods.

As an example, you may want to create a facility on your website that allows the public to report fraudulent use of your logo or mark (see [3.3.5](#)).

See more on monitoring in Assurance system monitoring below.

Assurance system monitoring

3.3.2.1 What If requiring assurance providers to play a role in monitoring, include these requirements in your assurance procedures.

Why In order for assurance providers to play an effective role in monitoring claims use, they need to have clear requirements from the outset, to allow them to consider costs.

Considerations If using assurance providers, include this in the appropriate assurance procedures and be clear about exactly what is required.

For example

Should the auditor specifically review all uses of claims, a sample (how large); at each audit; make specific visits to check, etc.

If there is an expectation that this will be handled as a matter of course within the audit, this must be included in the certification procedures (or related document instructing auditors) so that the auditors design their procedures to include this and allow time in the audit.

3.3.3 Reporting on claims use by approved users

What Clearly define requirements for regular reporting of claims use by approved users (eg, volume of sales, countries of sale, etc).

Include a requirement to report on any changes that will affect their ability to use the approved claim.

Why Having this information will allow you to note changes, growth and anomalies in the uptake of your system, and to charge accordingly for the use of your claim (if this fits your business model).

Considerations One of the simplest ways to monitor your system is to require reporting by your approved users.

This is normally specific to product-related claims, but may also apply in group scenarios where the size of the group may change.

This can be reported in volumes, sales, numbers, countries of sale, etc. You can expand this to include a list of uses, etc.

Consider what will help give you the greatest insight to how your claims are being used, and consider this from a misuse perspective.

Changes that may affect the ability to use the approved claim could be loss of certification (chain of custody or production), change of suppliers, packaging redesign, and others.

3.3.4 Monitoring activities

What Determine the monitoring activities that will be undertaken.

Why This ensures that the monitoring activities are appropriate with the scale and nature of your claims system and can be adapted as necessary. It also helps you legally protect your trademark.

Considerations As you track compliance with and misuse of your claims system, you should introduce additional monitoring activities. Some of these are described below. It is useful to employ a combination of different techniques at the appropriate scale.

This is something that will continually evolve, but it is important to have a plan in place to undertake monitoring. You should design it to be appropriate to your organisation and set minimum numbers of

monitoring activities per year or per user, or reflect the amount of monitoring using percentages (of users, uses, regions, etc).

You may also wish to identify a certain level of growth, or of identified misuse, after which you will take further action (for example additional or alternative monitoring or surveillance).

See more on monitoring in [Examples of monitoring activities below.](#)

Examples of monitoring activities

3.3.4.1 What Online tracking system Determine whether you will require the use of an online tracking system.

Why This is a powerful tool for preventing fraudulent claims for those systems where there is a significant threat of fraud.

Considerations Many systems are now requiring live tracking of certified products through supply chains, to ensure that non-certified product does not falsely enter the supply chain. Normally this requires submission of data by supply chain actors to allow tracking of assured product through the supply chain.

This is a significant and powerful undertaking and if you decide to use this type of system, it is

essential to have early and regular communication your stakeholders.

If using this type of system, you should determine responsibility for submission of data, which data must be submitted, consider confidentiality of data and how it will be maintained, etc. This may be something you wish to do at a later stage of development as participation in your scheme increases in value.

3.3.4.2 What Product tracebacks Determine whether you will conduct tracebacks on claims in your supply chains.

Why Tracebacks can allow targeted or random checks and provide a useful reflection of the functioning of the claims programme.

Considerations This involves identifying a claim being made somewhere along the supply chain and tracing it back to the point where the claim was first assured (eg, the farm for a sustainable farming standard).

This will have different levels of effectiveness for different models of chain of custody, but is one useful approach.

If using this approach, you should include requirements in your licensing agreement for the provision of information to the party conducting the traceback, and identify these responsibilities.

3.3.4.3 What Market surveillance If relevant, determine the intensity and responsibility for any direct surveillance of certified products in the marketplace.

Why Direct surveillance gives you a good understanding of how your claims are being used in the market.

Considerations This can be very resource intensive but can be useful to get an understanding of how your claims are being used and whether you need to provide additional guidance.

It is particularly useful where there is a rapidly growing market or sector and you want to check consistency and understanding.

Examples of monitoring activities (continued)

3.3.4.4 What Product testing

If relevant, develop procedures and technical requirements for product testing.

Why Product testing helps to ensure the integrity of the supply chain—that products do come from certified sources.

Considerations This can be used, for example, to determine legitimacy of claim of

- › origin (genetic testing) or
- › content (pesticide residues).

Product testing costs have decreased over time and can be a helpful complement to your overall monitoring programme.

It is important to determine your sampling regime and to consider whether you are trying to determine statistical significance or using testing to get a sense of practice in a particular area or sector.

Either are fine, but it is useful to be clear in advance.

3.3.4.5 What Web crawling service Consider whether to use a web crawling service to detect misuse of claims online.

Why This can be particularly useful for non-product specific claims and is a relatively inexpensive and effective way to monitor online claims.

Considerations This is a service that searches the internet for certain words or phrases.

There are various providers that can be used for this, including a simple Google alert.

As your scheme grows you may want to pay for more advanced services that can be tailored to your needs.

3.3.4.6 What Product tagging Consider whether product tagging technology should be integrated into your scheme to track products through supply chains.

Considerations This is another means of avoiding that fraudulent products enter the supply chain at different stages, including final sale.

Incorporating this approach will depend on the value and nature of your products.

For example

Where products like wood maintain their integrity through much of the supply chain, it is possible to tag these products with RFID chips¹.

The cost of this technology is decreasing though it is still expensive for high volume products.

¹*Radio-frequency identification (RFID) is the wireless use of electromagnetic fields to transfer data, for the purposes of automatically identifying and tracking tags attached to objects.*

The tags contain electronically stored information.

Why Product tagging is a very thorough way of enabling tracking and transfer of information through the supply chain.

3.3.5 Reporting tool for misuse of claims

What Provide easy access to a reporting tool that stakeholders can use to report misuse of claims.

Why This approach takes advantage of the various actors that may come across misuse of claims related to your system and gives them an easy way to let you know about it.

Considerations Often sceptics are looking out for misuse, or organisations are watching what their competitors are doing and may come across issues. It saves time and money for you to provide an easy way to receive this information, which can complement your own more proactive monitoring strategy.

A simple way to do this is to provide an easy reporting tool on your website. You need to be able to filter genuine reports from unfounded ones, so be sure to collect minimum information to be able to investigate the report, including the name

of person raising the issue, date of misuse observed, by whom/brand, where (eg, on packaging, promotional items), nature of misuse, and ability to upload an image or document.

In some cases you may need to protect the identity of the person raising the issue, however, you need to manage your resources and incident investigation can be very time consuming, so it is important to understand as much as you can about the issue and how to get more information.

3.3.6 Monitoring license fees

What Track payment of licensing fees (if applicable) by claims users.

Why Apart from financial considerations this will give an indication of the risk level of the claims maker and can lead to greater controls being put in place.

Considerations This point applies if you have a license fee associated with any claims (eg, certificate fee, logo use, administration fees, etc.) See [2.3.1](#).

Particularly for fees that incur a volume royalty based on sales, you may find it useful to link payment to the reporting of use of claims.

3.4 Enforcement

3.4.1 Incident management procedures

What Prepare and use incident management procedures for handling reports of claims misuse when they come in.

Why Rather than being reactive, it is useful to have defined a procedure to follow in advance of an incident to allow for an efficient handling of the issue.

Considerations The first step in incident management is usually classifying the misuse to understand how significant it is, which will determine the rest of your procedure.

The rest of the procedure will include steps to investigate the misuse to understand the extent, origin and reason and the necessary steps to rectify it.

There are two main types of misuse violations:

- > violations committed by those 'inside' the system, ie, those with license agreements, and
- > violations 'outside' the system, ie, those with no current relationship with the system.

See [Managing different types of misuse violations overleaf](#)

Managing different types of misuse violations

3.4.1.1 What Misuse by participating participants

If requiring assurance providers to play a role in monitoring, include these requirements in your assurance procedures. Prepare and use procedures for misuse by participants with an existing relationship with the standards system.

Considerations This is where the efforts to be clear on responsibilities for approval for use become very important, and that it is clear who is responsible for investigating and dealing with misuse.

You may wish to require your assurance providers to be able

to investigate this, but will need to consider how that cost will be borne and define in advance what is expected of them (reaction times, etc).

You should include the necessary clauses in a license agreement to allow suspension of permission in certain scenarios.

3.4.1.2 What Misuse by non-participating entities Procedures for misuse by those with no existing relationship with the standards system.

Why The more set procedures you have in place in advance of discovering misuse, the more efficiently you can respond, and the less the misuse will interrupt your ongoing work.

Considerations Where misuse occurs by those not engaged with your scheme, it will be your responsibility to react to it.

In many cases the misuse is unintentional, and the way to resolve it is to simply contact the organisation involved and explain the requirements.

This can often result in the organisation applying for a license agreement, or becoming certified or complying with your requirements in some other way. You should have a clear policy for the interim situation while they

are in the process of coming into compliance.

You should also have an escalation procedure, for where the misuse is intentional, or where the organisation chooses not to comply but to continue with the misuse. This is where having a registered claim is important, and the means for publicising misuse of your system. The escalation may need to involve legal cease and desist letters or other legal action, which can become expensive, so you may consider publicising misuse as a deterrent.



3.4.2 Suspension and withdrawal

What Prepare and implement clear procedures for the actions that lead to suspension and withdrawal of the right to use your claim, including who makes these decisions.

Why Clear procedures help to ensure that users of standards system making false or misleading claims are detected and prevented from making claims.

Considerations Note the strong link with your assurance and chain of custody programmes here.

Be clear whether a suspended certificate automatically results in suspended permission to use claims, or whether there is an additional action required by the scheme owner. Also ensure that permission to make claims can be removed without being directly linked to the assurance process.

The procedures should also include information about the minimum length of suspension/exclusion from the programme and what steps are necessary to be allowed back in.

Be clear about who is responsible

for this, who enforces it, and where decision making responsibilities lie. There may be elements of this where you as the scheme owner must take action, but you may also need to specify requirements for assurance providers.

You should also be clear in advance about which information will be made public.

Note that suspension and withdrawal can only be used as an enforcement technique when the organisation involved in the misuse is within the system.

See 3.4.1.2 for incident management procedures for the actions of those not involved in the system.

3.4.3 Communicating about suspended or withdrawn approvals

What Make information public about users that have been suspended or had their permission withdrawn as a result of misuse of claims.

Why This practice in particular will improve the trust in your claims, and act as a significant deterrent to misuse.

This will help to inform potential customers of those with suspended or withdrawn permissions that they are not able to offer controlled product.

Considerations The responsibilities here will be impacted by who has responsibility within the suspension and withdrawal procedures.

It will most likely lie with the scheme owner, in relation to the publicly available information about who has permission to use the claims, and for which uses.

At minimum you need to remove the users who have had their permissions removed from your list of approved users, but more effective is to include a list of those who have had their permissions withdrawn.

It must be clear in your license agreement that there is this potential, to avoid lawsuits.

3.4.4 Notification of changes in claims use permissions

What Prepare and implement a system for communicating changes of permission to use the claim through the supply chain, based on loss of permission at one stage in the supply chain (if applicable).

Why Users of your system are notified promptly and misuse of claims is not carried through the chain inadvertently.

Considerations For claims that depend on a certification through a supply chain, it is important to consider how loss of certification or permission at one stage in the supply chain will be communicated through the rest of the supply chain.

For example With a label to highlight responsible production, and that producer loses its certification, there need to be clear rules for the status of the product already in the supply chain (ie, can it still be sold as certified?), and the process for preventing further use of claims on non-certified products.

It may be that product already in the supply chain can continue to carry the claim – the key is to be clear about what the rules are in this case.

If using an online tracking system, alerts can be easily issued to members of the affected participant's supply chain.

Most important is to have the relevant and up to date permissions for use of claims publicly available online. This way all organisations have the opportunity to check the status of the claim before purchasing or before making a claim.

Remember to be clear about the link between permission for claims and the assurance process (and certification status).

Providing certification status online as the means of making the information available requires an organisation to seek the information about their supplier(s) on a regular basis.

Alternatively, suppliers can proactively send a notification about changes in status. This can be sent to all organisations to notify of changes to one company's status, or those with related/relevant scope. It can also be useful to inform assurance providers.

3.5 System review

3.5.1 Claims system complaints mechanism

What Provide a complaints mechanism regarding your claims process.

Why Concerned users have access to a clear and transparent mechanism to raise complaints, which can increase trust in the standards system.

Considerations There may be concerns with the rules you set regarding permitted claims.

This can easily be wrapped up in your organisation's complaints mechanism (as outlined in each of ISEAL's Codes).

Note the distinction from reporting misuse (See 3.3.5 above) and ensure an easy redirect from here for those wishing to report misuse.

*See **Managing different types of misuse violations** below*

*See www.iseal.org for ISEAL's 'Codes of Good Practice', also listed in **Referenced Publications**, page 48*

3.5.2 Claims system feedback

What Set up a system to record feedback on the claims and claims system once the system is operationalised.

Why Planning in advance how to record feedback will increase the likelihood of doing so, and will provide a central place to record information.

This will allow you to improve the claim and claims system systematically over time.

Considerations This can be a simple Microsoft® Excel document or a database. The key is that it is centralised and all relevant internal staff know about it and use it.

You should be clear about the nature of feedback you will record, and include different types from different sources to be most useful. You should reach out to various staff within your organisation to get a complete picture of the feedback.

3.5.3 Claims system evaluation

3.5.3.1 What Evaluating and revising rules Periodically evaluate the **rules** you have in place for the use of claims to determine whether they have been implemented correctly and to revise them if necessary.

Why Periodic review is important to ensure that allowable claims remain relevant and accurate while responding to stakeholder needs.

Considerations As your system evolves you may find that you need to tighten controls or add more flexibility to the claims that you permit.

You should review your claims-related complaints, feedback and recorded exceptions as you consider revising your rules. You could also carry out surveys of your users to understand the applicability of the rules.

At minimum you should review your rules in line with revisions to your standard (eg, every five years), but it is likely that you will need to review your claims rules more frequently as the system is used and tested.

3.5.3.2 What Evaluating and revising procedures Periodically evaluate your **procedures** for managing claims to determine whether they have been implemented, how well and to revise any of them as necessary.

Why Periodic review allows for a regular reflection on the effectiveness of your procedures and how they can be improved.

Considerations Based on the feedback you have collected you will be able to revise your procedures for managing claims to focus on the most necessary areas.

It is useful to pre-determine the timing of a review, and adjust as necessary depending on how urgent the need for revision of your procedures. You may choose to review the procedures after one year of use, or a certain number of approvals, or after the first complaint, etc.

Annex A

ISEAL Credibility Principles and Claims and Traceability

The ISEAL Credibility Principles provide an important reference for this document.

Since this guide does not provide detailed guidance for all situations that can occur, the Principles should be used as guidance for situations that are not covered.

The ten Credibility Principles are presented below, with notes on how they relate to claims and labelling. Further information can be found at

www.iseal.org/credibilityprinciples

1 Sustainability

Standards scheme owners clearly define and communicate their sustainability objectives and approach to achieving them. They make decisions that best advance these objectives.

What it looks like in practice

The claims made by a standards system and its users are consistent with the sustainability objectives of the standard.

Claims are supported by the use of an appropriate traceability model, and can be substantiated.

2 Improvement

Standards scheme owners seek to understand their impacts and measure and demonstrate progress towards their intended outcomes.

They regularly integrate learning and encourage innovation to increase benefits to people and the environment.

What it looks like in practice

Claims, the traceability system and any market-facing activities are reviewed and improved to strengthen their contribution to the system's sustainability objectives.

3 Relevance

Standards are fit for purpose.

They address the most significant sustainability impacts of a product, process, business or service.

Only include requirements that

- › contribute to their objectives
- › reflect best scientific understanding and relevant international norms; and
- › are adapted where necessary to local conditions.

What it looks like in practice

Claims relate to the content of the standard and do not claim to achieve more than the standard requires.

4 Rigour

All components of a standards system are structured to deliver quality outcomes.

In particular, standards are set at a performance level that results in measurable progress towards the scheme's sustainability objectives, while assessments of compliance provide an accurate picture of whether an entity meets the standard's requirements.

What it looks like in practice

Scheme owners control the claims made by participants in their systems and have appropriate traceability systems in place. Product-related claims can be traced back to certified operations.

5 Engagement

Standard-setters engage a balanced and representative group of stakeholders in standards development. Standards systems provide meaningful and accessible opportunities to participate in governance, assurance and monitoring and evaluation.

They empower stakeholders with fair mechanisms to resolve complaints.

What it looks like in practice

Stakeholders are consulted in the development of the claims of the system, and with regard to the appropriate traceability system for those particular claims.

There are clear ways for concerned stakeholders to submit information about incorrect or misleading claims.

6 Impartiality

Standards systems identify and mitigate conflicts of interest throughout their operations, particularly in the assurance process and in governance.

Transparency, accessibility and balanced representation contribute to impartiality.

What it looks like in practice

Stakeholders are consulted in the development of the claims.

Mechanisms are in place to manage conflict of interest in the control of claims and labels, and in the operation of associated traceability systems.

7 Transparency

Standards systems make relevant information freely available about

- › the development and content of the standard,
- › how the system is governed,
- › who is evaluated and under what process,
- › impact information and
- › the various ways in which stakeholders can engage.

What it looks like in practice

Information that substantiates claims is made available to interested parties, including

- › information about product-specific claims and
- › the traceability systems that support these claims.

8 Accessibility

To reduce barriers to implementation, standards systems minimise costs and overly burdensome requirements.

They facilitate access to information about meeting the standard, training, and financial resources to build capacity throughout supply chains and for actors within the standards system.

What it looks like in practice

- › Costs for using labels or making claims are not prohibitive.
- › The traceability process is no more onerous than necessary to support the associated claim.

9 Truthfulness

Claims and communications made by actors within standards systems and by certified entities about the benefits or impacts that derive from the system or from the purchase or use of a certified product or service are verifiable, not misleading, and enable an informed choice.

What it looks like in practice

All claims made about the standards system are accurate and can be substantiated, whether they are on-product claims or otherwise.

Claims are easy to understand, avoid overstating the benefits resulting from the standards system and are accurate and precise in their language.

Claims are comparable, or at least provide comparable data.

While claims cannot convey all the relevant details about a certified product or service, they provide sufficient information to be verified, either directly or through links to websites or other sources of information.

Claims related to product origin (such as through on-product labels about production practices) will have a traceability system in place suitable for the type of supply chain and claim being made.

As appropriate, these include

- › product tracking through the supply chain (product origin claims),
- › mixing of certified and non-certified product ('contributes to/supports' or percentage-based claims), or
- › trading volume certificates separately from the certified product ('contributes to/supports' type claims).

10 Efficiency

Standards systems refer to or collaborate with other credible schemes to improve consistency and efficiency in standards content and operating practices.

They improve their viability through the application of sound revenue models and organisational management strategies.

What it looks like in practice

If a standard is developed where another system already exists, the level or approach of the standards system, as well as resulting claims, are sufficiently different to avoid confusion by users.

Annex B

Recommended publicly available information

Transparency is essential for credible claims

For ease of reference, the following list summarises the recommended actions in the document where it is recommended that information be made publicly available.

2.1.1	Who can make claims	2.3/	Fee structure for use of claims,
2.1.2	Pre-requisites for requesting approval to make a claim	2.3.1	Financial model
2.1.3	Minimum content or activity requirements	2.4	Claims and logo use approval process
2.1.5	Chain of custody claim limitations	2.5	User guide and supporting documents
2.2	Display requirements for text claims	3.2.3	Approved users and uses
2.1.7	Pre-requisites for requesting approval to use a logo	3.2.4	Renewal or reporting procedure
2.2.1	Displaying logos or ecolabels	3.3.5	Reporting tool for misuse of claims
1.4 or	Access to further information	3.4.3	Communicating about suspended or withdrawn approvals
2.3.3		3.5.1	Complaints mechanism

Components of a claim

Figure 2 | Claim 1



Subject

- > What is the claim about?
- > Which part of the product, business or service?

'this product...'

'this shipment...'

'this ingredient...'

'our company...'

'the cardboard in this packaging...'

'this service...'

Traceability information

For product claims

Explain whether the origin of the product is known, how it is linked to the claim.

'comes from (a source)...' or **'comes from x source'**

'contains at least x% certified content'

'contributes to...'

'has supported the sustainable production of...'

'benefits (user or 'responsible production')...'

'supports...'

Achievement

Status of the product.

'certified'

'verified'

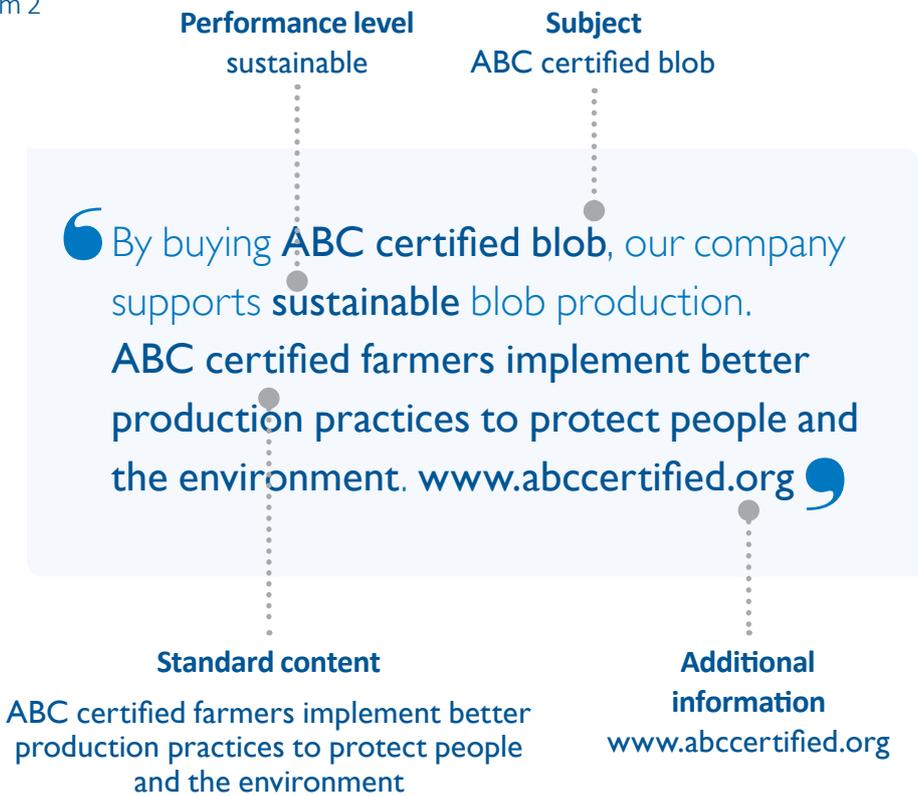
'has been awarded the XYZ ecolabel (...which means...)'

'...that has met the 'Good Practice' Standard'

'traded in compliance with 'x' standard'

'helps support better practices'

Figure 3 | Claim 2



Additional information

eg, links to a website, standard rate telephone number and/or QR code.

See 1.4 for further info

Standard content

Describes the subject of the standard, what it focuses on.

‘for responsible forestry practices’

‘ensures better pay for producers’

‘protects water resources’

‘environmental impact’

‘is among the best performers for energy efficiency’

Assurance process

Describes whether there was an external, independent check, whether there was a second party check or whether it is self-declared.

‘independently certified to...’

‘certified’

‘commits to’

‘testifies that...’

‘this facility’

Performance level

Describes whether this is a standard that highlights best practice, or seeks to eliminate worst practices, and in between.

‘has eliminated worst practices’

‘met a different, lower bar’

‘good practice – that allows lower entry and requires improvement over time’

‘good practice – from first time a claim is made’

‘top 10%’

Annex D

Performance levels of standards and related claims

There are many approaches to how a standard system determines its performance level.

However, there is usually a difference in the stringency of the requirements in a standard. This table attempts to capture some general approaches but is not exhaustive.

Many claims can be used appropriately in the context of a path to improvement, rather than as an absolute level of performance, eg, encouraging more responsible production; moving producers toward sustainability.

Performance levels of standards

We've identified four performance levels and related claims as listed here:

Avoid the worst practices

Good practice | With allowance for improvement over time to achieve the final performance level

Good practice | From the first time a claim is made

Recognise top performers only

Call for input This table is provided for discussion as part of the overall consultation. We welcome your input on the following table, and in particular, the questions below:

- › Is it possible to categorise performance levels of standards in this way? That is, can we define limits to when specific terms can and cannot be used or does this approach create artificial boundaries that are not useful?
- › Pulling out the range of widely used and amorphous claims—better, leading, responsible, ethical, sustainable, whatever else is on the sheet—and maybe asking about pre-requisites for use—what needs to be in place?
- › Are there any specific conditions that should be required for claims about improvement or progress standards?

Avoid the worst practices

Other terms/variations Minimum requirements

Characteristics of this level

- › Requires elimination of worst practices
- › Seeks to generally improve the performance of a whole industry or sector, leading to aggregated impacts
- › Does not try to identify 'best practice'
- › Capacity building is often included in this approach.

Suggestions for credible wording, considerations

'better practices than the industry norm'

'eliminates the worst form of (sustainability issue)...', eg, child labour

Generally refers to **'better'** or

'more responsible than the industry norm'

Can use these words with qualification: eg, encouraging more responsible production; moving producers toward sustainability

Do not allow

Do not allow without further qualification

'sustainable'

'best practice'

'good practice'

Do not overclaim

Good practice

With allowance for improvement over time to achieve the final performance level

Other terms/variations

Continous improvement, Stepwise

Characteristics of this level

- › Does not permit any of the ‘worst’ practices
- › Overall, the standard requires a fairly high level of performance, generally accepted as good practice
- › Requires a certain level of performance initially, then requires regular improvement
- › May permit a certain number of criteria to be met, but choice can be at discretion of certified enterprise
- › Capacity building is often included in this approach to lead to the required improvements over time

Suggestions for credible wording, considerations

See *Key point | The word ‘sustainable’, page 1*

- › Claims to match lowest performance level allowed (eg, can use **‘responsible’** if initial level is good practice)
- › Note the pillars that are considered –eg, **‘environmentally responsible’**
- › Only allow use of logo when an acceptable performance bar has been reached (eg, after an improvement threshold)
- › Consider whether a later permission to use an on-pack claim could provide incentives for improvement

From the first time a claim is made

Characteristics of this level

- › Does not permit any of the ‘worst’ practices
- › Overall, the standard requires a fairly high level of performance, generally accepted as good practice
- › Normally requires all criteria to be met but may permit a high percentage of criteria to be met, with choice at discretion of certified enterprise (not necessarily a requirement to improve)

Suggestions for credible wording, considerations

See *Key point | The word ‘sustainable’, page 1*

Note the pillars that are considered –
eg, **‘environmentally responsible’**

‘responsible’
‘sustainable’
‘well managed’

Recognise top performers only

Characteristics of this level

Determines average performance and only recognises those in the top of the product category. Often this is the top 10%, but may be more. The bar changes deliberately over time as the category improves.

Suggestions for credible wording, considerations

‘top 10%’

Be careful about using **‘sustainable’** (because top 10% might still not be sustainable if the starting point is very low).

Annex E

Assurance models of standards and related claims

The assurance model used in a standards system influences the types of claims that can be made.

This table presents a range of assurance models and the implications for what claims are credible and not, noting that there are numerous variations to these approaches and that standards systems often combine two or more assurance models. In all cases, it is important to not overclaim regarding the minimum assurance requirements.

Assurance models of standards and related claims

We've identified five standards models as listed here:

Self-declared

Self-assessed

Peer reviewed

Second-party verified

Third-party certified

Self-declared

Characteristics of this model

Entities state that they meet the standard, but do not provide evidence.

There is often a mechanism for the standard owner to request evidence to demonstrate the claim, or to conduct unannounced inspections. If this is the case, entities can add **'...and are subject to unannounced inspections'** or similar to these claims.

Recommended wording

'entities are committed to producing (product x) in line with the 'y' standard'

Do not allow

'independently verified'

'certified'

'guarantees' x practices

Self-assessed

Characteristics of this model

Entities submit information demonstrating how they meet the standard.

Recommended wording

'entities demonstrate that they produce (product) in line with the 'y' standard' through a self-assessment tool'

Include a link to evidence if possible

Do not allow

'independently verified'

'certified'

'guarantees' x practices

Peer reviewed

Characteristics of this model

A similar entity to the one being assessed reviews compliance against the standard.

A similar entity is one that would also be eligible to be assessed against the standard.

Recommended wording

'this entity has been assessed by peers and found to meet 'y' standard'

Do not allow

'third-party certified'
'guarantees' x practices

Second-party verified

Other terms/variations

Second-party certified

Characteristics of this model

The assessment is carried out by a party that is related to the entity.

For example

- › a customer
- › industry association, or
- › the scheme owner.

Peer review can also be considered a form of second-party verification

Recommended wording

'we are an approved supplier of 'z' company'

'we are a member of 'x' association and support their responsible sourcing approach'

'this entity has been assessed by x and found to meet 'y' standard'

Do not allow

'third-party certified'
'guarantees' x practices

Third-party certified

Other terms/variations Independently certified

Characteristics of this model

The assessment is carried out by a party that is not related to the enterprise being assessed.

Recommended wording

'certified'

'independently certified'

'this entity has been independently assessed and found to meet the 'y' standard'

'certified against the ABC standard by a third-party certifier'

Do not allow

'guarantees' x practices

Annex F

Chain of custody models and related claims

In general the following product-specific claims are considered good practice for each chain of custody (CoC) model.

However, note that different users have different definitions of how each chain of custody model works. This table does not attempt to clarify these definitions, only to note the characteristics and related claims. Also note that a combination of models may be applied in some supply chains.

Overall note about chain of custody models

Many stakeholders that commented on this table requested that the document also include the recommendation that standards systems use claims to provide incentives to move up the table from certificate trading and mass balance towards identity preservation and segregation.

They note that this is what will drive real change in supply chains, and will be more likely to have impact on sustainable production.

Certificate trading may be used to connect certified suppliers with interested buyers where the cost of changing the supply chain, at least initially, is prohibitive.

And mass balance may be used to provide rewards to producers that are producing sustainably, before there is sufficient supply to be able to require segregation.

However, the argument is made that if we wish to scale up sustainable production there is the potential that keeping these systems without shifting to more direct links in the supply chain will enable unsustainable production.

Standards systems should therefore regularly consider which models they permit, and how they are creating incentives for real change through linking suppliers with buyers.

Note For models where mixing with non-certified product is allowed (known percentage blending, controlled blending and mass balance), some systems also require a lower level of control over the non-certified content, eg, **'controlled wood'** in the case of forest certification. We have not tried to suggest different claims for this scenario, but the overall claims of **'responsible'** sourcing can be enhanced in this case.

Chain of custody models and related claims

We've identified six chain of custody models as listed here:

Identity preservation

Segregation

Know percentage blending

Controlled blending

Mass balance

Certificate trading

Identity preservation

Other terms/variants IP, hard IP

Characteristics of this model

Can trace specific product right to its source (the source that is the subject of the sustainability standard).

Credible wording¹

'comes from'

'is from'

'contains'

then the option of stating the specific production site or just saying **'a certified source/source that meets x requirements'**

...or any below

Do not allow

IP claims when **segregation** is really being used

Segregation

Characteristics of this model

No mixing with non-certified product of the same ingredient – whole content is certified. Could be from different certified sources.

Can trace product to the point where it was mixed with other certified sources. Traceability is in place to ensure only certified sources are in the product.

Credible wording¹

'comes from' or
'is from'
'contains'

then **'a (certified) source'** or a **'source that meets x requirements'**

...or any below

Do not allow

Do not overclaim. Sometimes IP is confused with **segregation** – you know that it is from a certified source, but may not know exactly which source due to mixing of certified products.

Known percentage blending

Characteristics of this model

- › Mixing of certified and non-certified volumes is allowed towards the end of the supply chain.
- › There is fairly high level of confidence in the percent of certified material in the batch of the final product, due to the nature of the blending.

Credible wording¹

'this product contains at least x% of (commodity) from certified sources'

'at least x% of the (commodity) in this product comes from certified sources'

Do not allow

'this product contains...' with no qualifying language eg, **'at least'**

Controlled blending

Other terms/variations Factory gate mass balance

Characteristics of this model

- › Mixing of certified and non-certified volumes is allowed towards the end of the supply chain.
- › There is fairly high level of confidence of some certified material in the final product, due to the nature of the blending.
- › Product or ingredient is segregated and traced to the consumer product factory gate where it is then mixed with usually non-certified sources of that same product or ingredient (eg, cocoa).
- › 100% of the ingredient volume needed for labelled products must be delivered to the factory throughout the year.

Credible wording¹

'supports the production of' or 'contributes to the production of' or

'We buy (or source) at least x% of our cocoa from certified farms, traceable from the farms to our factory. Visit www.brand.com/certified for more details.'

Do not allow

'this product contains...' with no qualifying language eg, **'at least'**

'up to x% of the (commodity) in this product comes from certified sources'

¹In general this refers to wording for business to consumer claims that may be permitted, or where the user is making a purchasing decision based on the claim in isolation. In B2B the nature of interaction will be different with more information exchange and more time for decision-making.

Chain of custody models and related claims (continued)

Mass balance

Other terms/variations Blended

Characteristics of this model

- › Mixing of certified and non-certified volumes is allowed at any stage in the production process, provided that the quantities are controlled.
- › May be a percentage-based or a volume-based system.
- › No guarantee of any certified product in final product.
- › Sustainability data (documentation) is disassociated from the physical certified product.

Credible wording¹

‘supports the production of...’ or ‘contributes to...’

‘on average x% of content sourced for this product over the last year came from certified sources’

If using a logo with the claim consider placement and supporting text to ensure the use of the logo is not misleading.

Do not allow

‘this product comes from a certified source’

‘this product contains...’

Certificate trading

Other terms/variations Book and claim

Characteristics of this model

- › No link between claim and actual product.
- › Number of certificates are centrally controlled and related to certified production.

Credible wording¹

‘supports the production of...’ or ‘contributes to...’

‘has supported the sustainable production of x MT of (commodity) by purchasing x MT of credits’

If using a logo with the claim consider placement and supporting text to ensure the use of the logo is not misleading.

Do not allow

‘this product comes from a certified source’

Definitions

Appropriate Suitable or proper in the circumstances (Google); Suitable for a particular person, condition, occasion, or place; fitting (thefreedictionary.com)

Assured claim A claim that results from an assurance process against the standard. Refers to claims about a product, process, business or service that has been certified or verified in compliance with a standard. Examples include use of logos/labels/trustmarks and claims of certification against a standard.

Certificate Generic expression used to include all means of communicating that fulfilment of specified requirements has been demonstrated (ISEAL Assurance Code v1.0)

Chain of custody The custodial sequence that occurs as ownership or control of the material supply is transferred from one custodian to another in the supply chain. (Adapted from WB, WWF *Alliance for Forest Conservation and Sustainable Use*, 2002)

Claim maker Any party that wishes to make a claim about the standards system. Normally this is a business in the supply chain but also includes other parties that wish to make a claim about the standard.

Controlled claim A sustainability claim directly linked with the standards system and which requires approval for use. Includes 'assured' claims and 'marketing' claims.

Entity The product, process, business or service that is the subject of the standard. (*Credibility Principles*, June 2013)

Marketing claim A claim that is used to promote an aspect of or relationship with a standards system. It is not always completely distinct from an 'assured' claim (eg, an advertisement promoting a certified product).

However there will be instances, such as promotional posters, that are not product specific, where the use of the claim is clearly for marketing purposes alone.

Publicly available Obtainable by any person, without unreasonable barriers of access.

Note Information that is published on an organisation's website and can be found through a basic and quick search is considered to be publicly available. 'Available on request' is not the same as publicly available. (ISEAL Impacts Code v2)

Scheme owner The organisation that determines the objectives and scope of the standards system, as well as the rules for how the scheme will operate and the standards against which conformance will be assessed. In most cases this is the standard-setting organisation. However, it may also be an assurance provider, a governmental authority, trade association, group of assurance providers or other body. (Adapted from 'Standards system owner' in the ISEAL Assurance Code, *Credibility Principles*, June 2013)

Stakeholder Individual or group that has an interest in any decision or activity of an organisation (adapted from ISO 26000, in ISEAL *Standard-Setting Code* v6).

Standard-setting organisation The organisation responsible for managing the development or revision of a standard. (*Standard-Setting Code* v5.2)

Sustainability claim A message used to set apart and promote a product, process, business or service with reference to one or more of the three pillars of sustainability (social, economic and/or environmental).

Claims may be consumer-facing or business to business. Claims which are not clear and accurate may provide the user with misleading or even false information.

See Key point | The word 'sustainable', page 1

Sustainability standard A standard that addresses the social, environmental or economic factors of a defined entity, or a combination of these. (*Credibility Principles*, June 2013).

Text claim A discrete collection of words used to make a sustainability claim, defined by the scheme owner.

Traceability Refers to the completeness of the information about every step in a process chain which allows for verification of origin of the material.

User Refers to users of standards systems (those making claims about the standards systems).

Referenced publications

ISEAL, *Principles for Credible and Effective Sustainability Standards Systems*. June 2013

ISEAL, *Code of Good Practice for Setting Social and Environmental Standards*.

ISEAL, *Code of Good Practice for Assuring Compliance with Social and Environmental Standards*. 2012

ISEAL, *Code of Good Practice for Assessing the Impacts of Social and Environmental Standards*.

ISEAL, *Guide to Understanding Sustainability Claims*. In development

Additional references

This short list includes only some examples of existing guidance.

You should find out whether similar documents exist in the countries or regions where your claims may be used.

[DEFRA Green Claims Guide. 2011](#)

Guidance aimed at those producing, selling, marketing or advertising products or services in the UK, and making or intending to make environmental claims. The purpose of the guidance is to promote the use of clear, accurate and relevant environmental claims in marketing and advertising.

[Federal Trade Commission's Guides for the Use of Environmental Marketing Claims \(*Green Guides*\), 2012](#)

Guide designed to help marketers ensure that the claims they make about the environmental attributes of their products are truthful and non-deceptive. Includes a section on the use of certifications and seals of approval.

[Guidance from the Danish Consumer Ombudsman on the use of environmental and ethical claims etc in marketing. August 2014](#)

The Danish Consumer Ombudsman's guidance on the use of environmental and ethical marketing claims covers areas such as general and more specific requirements to the use of claims as well as business profiling, the use of labelling schemes and certificates etc.

[Federal Trade Commission, 16 CFR Part 255, 'Guides Concerning the Use of Endorsements and Testimonials in Advertising'. 2009.](#)

Guide to describe truth in advertising when using endorsements including the need for proof and disclosure of when there is a connection with the endorser.

[ISO 14020, 'Environmental labels and declarations' – General principles. 1999.](#)

This International Standard establishes guiding principles for the development and use of environmental labels and declarations. It is intended that other applicable standards in the ISO 14020 series be used in conjunction with this International Standard. (ISO's term for 'claims')

[ISO 14021, 'Environmental labels and declarations – Self-declared environmental claims'. 1999.](#)

Describes a general evaluation and verification methodology for self-declared environmental claims

[ISO 14024, 'Environmental labels and declarations – Type I environmental labelling – Principles and procedures'. 1999.](#)

This International Standard establishes the principles and procedures for developing Type I environmental labelling programmes, including the selection of product categories, product environmental criteria and product function characteristics; and for assessing and demonstrating compliance. This International Standard also establishes the certification procedures for awarding the label.



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