

Waterwise Response to Defra Consultation on

Update to Defra's "Green Claims Guidance"

June 2010

Waterwise is an independent, not for profit, non-governmental organisation focused on decreasing water consumption in the UK and building the evidence base for large-scale water efficiency. We are the leading authority on water efficiency in the UK. In England, we sat on the UK Environment Minister's Water Saving Group alongside the water industry and regulators, for which we produced, in October 2008, the Evidence Base for Large-scale Water Efficiency in Homes. Phase II of the Evidence Base is co-funded by Defra.

Context

Water efficiency is a key tool in tackling climate change and adapting to it. 5% of total UK greenhouse gas emissions come from heating water in homes, so wasting less hot water in homes - and buildings - through more water-efficient taps, toilets, showers, washing machines and dishwashers will directly impact on carbon targets. We also know that in coming years there will be less water and more people in the UK, so less water will need to go further, through water efficiency. Water efficient products can also contribute to the development of the low-carbon economy, including through the manufacturing base.

There are a number of businesses which cite water savings as part of the environmental credentials of their products.

Water efficiency plays an essential role in environmental credentials, both directly through the reduction of water use by a company, and indirectly, for example through a reduction in packaging of a product which results in a reduction in the water footprint of the product, through less water having been used to produce the reduced amount of packaging.

Overall response

Waterwise welcomes the consultation and the proposal to ensure that environmental credentials in marketing and advertising of goods and services are clear and accurate.

Waterwise is supportive of the proposed changes to the guidance and believes that the additions to the guidance will help businesses gain confidence in making environmental statements in their marketing and advertising.

We support the good practice example detailed in section 4.2, which highlights the importance of water savings within a hotel environment and how these can be promoted.

We agree with the example set out in section 4.3 detailing the importance of both energy and water in the environmental benefit of a washing machine. This illustrates that an item which improves its energy performance at the expense of increasing its water consumption is not environmentally beneficial. In this instance Waterwise suggests that as good practice,

an “eco” washing machine should seek the accreditation of a recognised labelling scheme, which will highlight all the environmental benefits of the product.

Leading on from this, Waterwise supports the inclusion of section 7 – Third party labelling or declaration schemes. These schemes are useful to clarify environmental benefits of some products and services. There are a number of water efficiency labelling schemes within this category. These include the Waterwise Marque and the Bathroom Manufacturers’ Association’s Water Efficient Product Labelling Scheme. Waterwise is also working with stakeholders to seek to develop a single, cross-sector water efficiency labelling scheme, as recommended by the Walker Review on Charging for Household Water and Sewerage, in its final report in December 2009.

Responses to specific Questions

Question 2: Do you think there is a need to produce additional guidance for particular sectors? Why? Why not?

Environmental credentials can be highly varied between sectors; sector-specific guidance with tailored examples would be useful to industry. It may also be beneficial to create more detailed guidance specifically for manufacturing businesses. Manufacturing is an area in which there are a number of different ways to improve environmental performance, such as increased water efficiency, decreased packaging and reduction in raw materials used. A number of the examples in the revised guidance focussed on this sector, but this area of business is vast and more examples and direction would be useful.

Question 4: Do you agree with the proposed aims and scope of the updated guidance?

Waterwise does agree with these and believes that in the future it will be necessary to update the guidance regularly in order to keep in line with environmental legislation and changes in standard practise for businesses using environmental credentials in their marketing and advertising.

Question 6: Do you think it is important to understand/consider the overall environmental impact of a product, service or organisation before making an environmental claim?

We believe it is essential to understand all aspects of the environmental impact of the product, service or organisation. Unless the complete impact is known and understood it is very difficult to provide an environmental credential and guarantee its validity. There are a number of instances where improving environmental performance in one stream has given rise to a negative effect on a secondary environmental stream. As already highlighted in your example under 4.3, and detailed earlier in our overall response, a reduction in energy consumption of a washing machine can lead to an increase in water consumption. This is often overlooked by businesses which are simply looking for a positive marketing angle.

Question 9: Given the high use of vague terms like ‘environmental friendly’ and ‘green’, should we include the following guidance on vague terminology to promote robust and consist in standards if/when they are used? (See guidance)

Waterwise believes that that this guidance is important to include. Vague terms are a growing problem in sales claims. This additional guidance will encourage businesses to support these terms with additional information. It also highlights the importance of other

environmental impacts, such as water, and as we have already suggested in this consultation response, these are often overlooked.

Question 17: Do you agree with the guidance and principles outlined on third party labelling?

We do agree with the guidance on third party labelling and support the principles that have been outlined. These give a business clear advice as to which labels they should be using as promotional tools – this will encourage businesses to accredit themselves to a trustworthy, recognised label.

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