Why Challenge Anti-paper Environmental Marketing Claims?

Just after Two Sides was founded in 2008, we launched a strategic campaign in the United Kingdom to challenge anti-paper environmental marketing claims being made by many companies to promote electronic billing and statements. Our goal was to eliminate unsubstantiated claims like “Go green, Go paperless” and “Go Paperless, Save Trees.” While the process was time-demanding and required many discussions and exchanges, it was resoundingly successful, with 80% of the companies engaged either changing or removing their anti-paper claims.

In mid-2012, we initiated a similar campaign in the United States after research showed that more than half of America’s leading banks, utilities and telecommunications companies are using misleading anti-paper environmental marketing claims. With over 60 cases to date and a target success rate of 80%, more than 40% of those contacted had already eliminated unsubstantiated anti-paper claims from their marketing, and Two Sides is systematically working with many others.

• Marketing claims like “Go green, Go Paperless” and “Go Paperless, Save Trees” do not meet guidelines for environmental marketing established by the U.S. Federal Trade Commission (FTC). Provisions of the FTC Green Guides include:

Section 260.2 - Marketers must ensure that all reasonable interpretations of their claims are truthful, not misleading, and supported by a reasonable basis before they make the claims. In the context of environmental marketing claims, a reasonable basis requires competent and reliable scientific evidence. Such evidence consists of tests, analyses, research, or studies that have been conducted and evaluated in an objective manner by qualified persons and are generally accepted in the profession to yield accurate and reliable results. Such evidence should be sufficient in quality and quantity based on standards generally accepted in the relevant scientific fields, when considered in light of the entire body of relevant and reliable scientific evidence, to substantiate that each of the marketing claims is true.

Section 260.3(d) - Comparative environmental marketing claims should be clear to avoid consumer confusion about the comparison. Marketers should have substantiation for the comparison.

Section 260.4(a) - It is deceptive to misrepresent, directly or by implication, that a product, package, or service offers a general environmental benefit. ¹

• Unsubstantiated environmental marketing claims like “Go paperless, Go Green” are damaging to the U.S. economy and threaten U.S. jobs. In fact, a total of 8.4 million jobs (6% of total U.S. jobs) that generate $1.3 trillion in sales revenue (8.6% of U.S. gross domestic product) depend on the U.S. mailing industry, which includes paper production, printing production, related suppliers, graphic design and the handling and distribution of mail. ²

• Print on paper has many unique environmental characteristics and can be a sustainable way to communicate. Print on paper originates from a renewable resource – trees grown in responsibly managed forests, is recyclable and is the most recycled commodity in the United States with a recovery rate of 65.1% in 2012. ³ Most of the energy used to produce U.S. paper comes from renewable resources. ⁴
When marketing messages like “save trees” and “go green” are used to encourage a switch from paper to electronic billing, they create a false impression that forests are a finite resource that are being destroyed by paper use instead of a renewable resource that is continuously replenished using sustainable forest management practices. In the United States, we grow more trees than we harvest. The country continues to benefit from a large and diverse forest inventory distributed across about one-third of total land area. The amount of U.S. forestland has remained essentially the same for the last 100 years at about 750 million acres, even though the U.S. population tripled during the same period.5

Over the last 50 years, the volume of trees growing on U.S. forestland increased 49%.6 Far from causing deforestation, the demand for sustainably sourced paper in the United States promotes responsibly managed forests that provide many environmental and social benefits. The income landowners receive for trees grown on their land is an important incentive to maintain, sustainably manage and renew this valuable resource. This is especially important in locales facing economic pressure to convert forestland to non-forest uses.7

The full impact of switching to e-media are often not properly considered and sometimes completely ignored. The direct impact of information and communication technology (ICT) products and services replacing paper is far from negligible, and the trade-off between the two “technologies” depends on conditions such as use frequency, source of energy, end-of-life management of the products, etc.8

It is estimated that the production and running of the ICT sector equates to 2% of global greenhouse gas (GHG) emissions, similar to the airline industry, and this is expected to double by 2020.9 This compares to the paper and print industries which account for 1% of global GHG emissions.10

In the United States in 2009 (the most recent U.S. EPA figures available), 47.4 million computers were ready for end-of-life management. Some 29.4 million were disposed of and 18 million (38%) were collected for recycling.11 This compares with a paper recovery rate of 65.1 in 2012.12

ICT manufacture is material-and energy-intensive. The production of each PC requires 22 kg of toxic chemicals, 240 kg of fossil fuels and 1,500 kg of water. Also, 80% of life-cycle energy use is accounted for before we even switch a PC on for the first time.13 This compares with paper, which is made using a renewable resource – trees from responsibly managed forests14, and with mostly renewable energy.15

The life cycle of e-statements is not paperless because many people print e-statements at home or at the office for record keeping and other uses. More than a third of U.S. consumers say they print some of their bills at home while 8% say they print between 80% and 100% of their bills at home.16

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1 U.S. Federal Trade Commission, 2013
2 Envelope Manufacturers Association, 2013
3 American Forest & Paper Association, 2013
4 American Forest & Paper Association, 2013
5 U.S. Forest Service, 2010
6 Society of American Foresters, 2007
8 Arnfalk, Peter, 2010
9 Gartner Inc., 2007
10 World Resources Institute, 2007
11 U.S. Environmental Protection Agency, 2011
12 American Forest & Paper Association, 2013
13 Computer Aid International, 2010
14 American Forest & Paper Association, 2013
15 American Forest & Paper Association, 2013
16 Two Sides U.S. Consumer Research Survey, 2013