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Interactive Session: Navigating Trends & Challenges in Environmental Claims

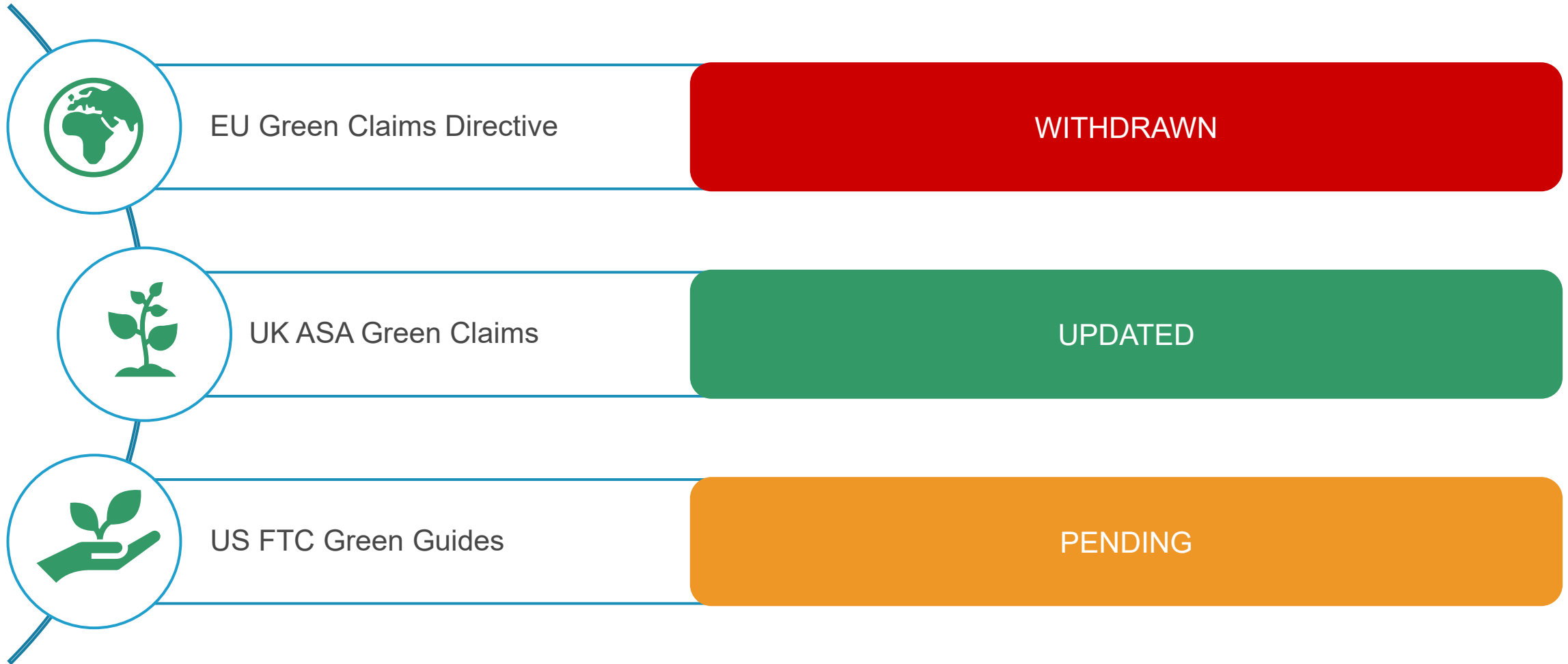
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Changes to the Regulatory Landscape



The Digital Markets, Competition and Consumers Act (DMCC)

April 6, 2025

DMCC – Giving the UK CMA power to penalise misleading claims

- CMA can issue provisional infringement notices based on suspicion alone without going to court
- Public
- Reputational damage, can demand changes
- Priorities in high impact sectors – food included in that sector
- Environmental messaging – same rigour and disclosure as legal and financial disclosures
- Retailers accountable for third party brand claims (conduct sufficient due diligence)



Recent rulings

Misleading recycling and composability claims

Misleading plastic packaging claims

Vague claims of long-term sustainability target

False low emission claim

False representation of product being sustainable

Unverified carbon footprint claims

Unclear environmental claims



Substantiation: evidence or empty

What regulators expect:

- Life Cycle Assessments (LCA)
- Third-party certifications (Rainforest Alliance, Fairtrade, etc.)
- Transparent, verifiable carbon accounting

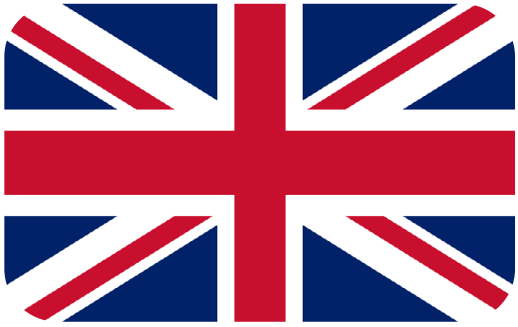






Compostable





Symbols and logos





Comparative claims



Packaging and plastics: a minefield

“Compostable,” “biodegradable,” “100% recyclable” often misunderstood.

- Sustainable solutions, are they good enough?
- More expensive
- Performance issues
- Demand for recycled materials exceeds the supply



Carbon neutral & net zero narratives

Food and beverage brands – from bottled water to snack producers – are increasingly under scrutiny for “carbon neutral” claims that rely heavily on offsetting, such as tree-planting schemes, rather than reducing emissions at the source.

Regulatory shift: authorities are now urging food and drink companies to adopt **specific, measurable emissions reduction pathways**, rather than relying solely on offsets to justify sustainability claims.

Proof of burden is on
the business



Avoiding greenwashing

Top tips for food & drink businesses:

- Be specific (“widely recyclable in the UK” > “100% recyclable”)
- Use independent certification, but don’t hide behind logos
- Train marketing, R&D, and regulatory teams together
- Keep claims under constant review – what’s compliant today may not be tomorrow



Questions?

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