

# Understanding Environmental and Social Responsibility Labels



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# Understanding Environmental and Social Responsibility Labels

## Executive Summary

In the not-too-distant past, environmental product labels were almost universally suspect. Advertising claims and product labels commonly included such meaningless terms as “eco-friendly,” “green,” and “all natural.” However, regulation and oversight, coupled with initiatives to quantify and verify product attributes, have given consumers a means of confirming claims of marketers. Three developments, in particular, stand out:

- Product certification backed by independent third-party verification was introduced for many types of products.
- The advent of the internet permitted easy access to information of all kinds.
- Life cycle assessment, a method of systematically evaluating environmental performance across a wide array of impact categories, brought integrity to determination of environmental impact and allowed development of new information portals for consumer use.

This report examines environmental product labels (ecolabels), types of labels, verification of label claims, and cautions for consumers. Labels focused on various aspects of social responsibility are also discussed.

## Labels Inform Purchasing Decisions

Certification programs such as the Underwriters Laboratory (UL) label and the Good Housekeeping Seal of Approval have long been familiar to North American consumers. The number of such programs increased dramatically beginning in the early 1990s, coinciding with the ability to disseminate information via the internet. According to Ecolabel Index<sup>1</sup>, there are 457 ecolabels in use today which cover a wide variety of products and product attributes. Now available to consumers are products that are third-party verified to be or have been:



- energy and water efficient
- formaldehyde free (building products, floor coverings, fabrics)
- free, or nearly so, of volatile organic compound emissions (adhesives, paints, finishes)
- organic (food and some types of fiber – such as cotton and flax)
- humanely produced and tested (food, cosmetics)
- produced without the use of child labor (clothing and other products)
- harvested in an environmentally responsible way (fish, timber)
- produced and traded in a socially responsible manner (wide variety of manufactured goods)

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<sup>1</sup> Ecolabel Index is a commercial entity, based in Canada, which claims to maintain the world’s largest global directory of ecolabels. <http://www.ecolabelindex.com/ecolabels/>

Labeling programs can be quite extensive. For instance, labeling of wood products is based on third-party assessment of forest management and timber harvesting based on publicly available standards designed to ensure appropriate protection of flora, fauna, water quality, soil productivity, historic areas, old trees, and more. Some of these programs also address social considerations, including giving attention to the rights of indigenous people; attention to rights of workers; and the well-being of local communities. Forests which are managed in accordance with requirements set forth in published standards are certified, and products originating from them are allowed to display certification labels. Through these kinds of programs, a wealth of reliable information is provided to consumers that was previously not available.

Independent third-party verification of product labels comes at a cost, which are paid by manufacturers and/or distributors and ultimately borne by consumers. In markets where otherwise identical products are available both as certified to environmental standards and non-certified, such as organically certified and non-organically produced food, it is common for the certified products to be sold at a premium.

Although ecolabels offer consumers a great deal of information, it is important to understand what is behind any label before accepting at face value what is implied by it. Labels differ with respect to type, how information which informs labels is obtained, and how label claims are verified.

## Types of Labels

Product labels can take the form of statements, symbols or graphics, on-product or package labels, or any of these representations in product literature, technical bulletins, advertising, publicity, telemarketing, and digital or electronic media. ISO, the International Organization for Standardization, under its 14020 series of standards, has established guidance for three types of labels.

### Type I

The most common type of label in today's market is a Type I label (see examples below). Qualification as a Type I label requires third-party certification of adherence to an established standard. Certification may be of a single attribute only (i.e. pesticide free or free of genetically modified organisms (GMOs)), or of adherence to an extensive set of criteria (i.e. responsible forest management; trade standards which focus on well-being of workers, community, and environment).



The Birds and Beans label shown above is an example of a product label which indicates adherence to multiple sets of criteria. The product is independently verified as bird friendly, organic, a fair trade item, and from a B-Certified roaster (B-Certified is explained later in this report).

## Type II

Labels that are classified as Type II provide criteria for self-declarations by a resource extraction organization (mining, for example), manufacturer or supplier (see examples below). In this case there are no set criteria, benchmarks, or quality checks. However, ISO requires that such declarations be verifiable and not misleading. Further, vague or ambiguous claims such as 'environmentally friendly', 'earth friendly', or 'more sustainable' are to be avoided. Verifiable terms such as 'made from x% recycled material', 'no CFCs' (i.e. no chlorinated fluorocarbons), or 'no GMO ingredients' are permitted. There is no third party review in Type II labels, meaning that all such claims are not independently verified.



For Type II labels, use of any of the following terms in U.S.-produced products requires adherence to specific requirements: compostable, degradable, designed for disassembly, extended life product, recovered energy, recyclable, recycled content, pre-consumer material, post-consumer material, recycled material, recovered/reclaimed material, reduced energy consumption, reduced resource use, reduced water consumption, reusable, refillable, waste reduction. Compliance is not regularly monitored, with corrective actions most often triggered by competitor or consumer complaints.

## Type III

Type III labels have the most stringent requirements. The rigorous use of life cycle environmental information, an open consultation process, third party review, and ease of comparison among products is required for use of Type III labels. This type of label conveys quantifiable life cycle data (energy consumption, greenhouse gas emissions, resource depletion, acidification potential, etc.). As of this writing, Type III certification is used largely in conjunction with business-to-business transactions, with reporting almost exclusively in the form of Environmental Product Declarations (EPDs).

The content and format of EPDs for groups of products that fulfill equivalent functions, such as floor coverings, are determined by Product Category Rules (PCR) which are developed with the involvement of stakeholders. Depending upon the product involved,

an EPD can be 20 or more pages in length.<sup>2</sup> The quality and accuracy of data is verified by an independent third party and follows the standardized principles of a life cycle assessment (LCA) as defined in a separate ISO standard.<sup>3</sup>

While LCA-based labels are most common in conjunction with business-to-business transactions, they are increasingly finding their way into consumer product lines. These efforts are being led by firms that offer third-party verification of manufacturer or vendor claims. For instance, products which carry the Green Circle Certified, Life Cycle Optimization label have obtained independent verification that life cycle impacts have been significantly reduced through application of life cycle assessment. Similarly, those bearing the Carbon Free and Carbon Neutral labels shown have undergone rigorous ISO-compliant life cycle assessment in order to verify claims.



ECOLOGO®, a program of Underwriter’s Laboratories, offers certification services for a wide range of products, from materials and energy and manufacturing and operations, to health and environment, product performance and use, and product stewardship and innovation. Under this program, products, services and packaging are certified for reduced environmental impact based on multi-attribute, life cycle-based environmental evaluation, testing, or auditing to established environmental performance standards.

An example of a distributor developed environmental labeling program is Home Depot Eco Options. Under this program, vendors who claim that their products have lower impact on the environment than comparable standard products must back their assertions by ISO-compliant, third party verified life cycle assessment.

These are but a sampling of the more than 100 firms that are engaged in assessment and verification of manufacturer or distributor claims. In some cases, such firms provide third-party verification of single attributes such as carbon emissions. Others offer oversight with respect to a broad range of claims.

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<sup>2</sup> For examples of EPDs prepared for a variety of North American wood products, see:

<https://www.awc.org/sustainability/epd>

<sup>3</sup> For additional discussion of EPDs and their development, see: *Environmental Product Declarations: Market Adaptation to the New Reality* (<https://dovetailinc.org/portfoliodetail.php?id=5e28c4e5bea30>) and *Environmental Product Declarations (EPDs) Are Coming – Is Your Business Ready?* (<https://dovetailinc.org/upload/tmp/1581653526.pdf>)



One area in which application of life cycle assessment has become common is in green certification of buildings. In many of the green building programs operating in the U.S. and around the world today, credits are awarded for application of life cycle assessment in evaluation of construction materials and even whole buildings.

### Government Sponsored Environmental Labels

The ISO guidelines for Type I, II, and III labels are intended to provide a structure for label development in various countries. But they are guidelines only. Each country approaches label development and administration differently. Most have laws which address deceptive advertising with respect to green claims by manufacturers and vendors that are backed by some kind of regulatory framework. Many have developed ecolabels within government agencies, and some provide special recognition to independently developed and administered labels through preferential purchasing programs.

#### United States

Five ecolabels have been developed and promulgated by U.S. government agencies. Three – ENERGY STAR®, Water Sense, and Safer Choice – are labels supported by the Environmental Protection Agency (EPA). The ENERGY STAR® and Water Sense programs focus on energy and water efficiency, respectively. The Safer Choice program is designed to help consumers identify safe cleaning and other household chemicals.



The EPA also works with business and industry, under its Design for the Environment program, to provide assistance in application of life cycle assessment to product and process redesign for the purpose of reducing environmental impacts and release of toxic materials.

Foods and fibers carrying the USDA Organic label adhere to production standards ensured by periodic oversight and enforcement. The USDA Certified Biobased label provides on-product third-party verified information regarding bio-based content, as opposed to petroleum-based content.

The EPA also coordinates an Environmentally Preferable Purchasing Program under which product lines carrying preferred independent and government ecolabels are specified as those which all entities of the federal government should specify in purchasing. About 30 different labels, which address various environmental concerns, are included in the listing.<sup>4</sup>

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<sup>4</sup> USEPA (2020)

Participation in each of these programs is voluntary, and all are backed by published national standards coupled with regulatory oversight to ensure that those involved are complying with program requirements.

A new USDA label associated with bioengineered products and materials will soon appear on U.S.-produced agricultural products. The label, which became voluntary on January 1, 2020, and which will be mandated beginning on January 1, 2022, is designed for use with any food product which contains genetic material that has been modified in a way that cannot be created through conventional breeding or found in nature.



### Canada

The national government of Canada operates an environmental labeling program. EcoLogo (also known as Environmental Choice) helps consumers identify the top 20% of products in any product category in terms of environmental sustainability. The program is operated cooperatively with Underwriters Laboratories (UL). Products are independently evaluated through their entire life cycles, from manufacturing through disposal, in accordance with published environmental standards. More than 7,000 products, from paint to paper, are approved for use of this logo.



The Canadian government also administers an EnerGuide label as part of ENERGYSTAR Canada. A voluntary organic food verification and labeling program, including standards development and regulation, is operated by the Canadian Food Inspection Agency.

### Europe

A program similar to that of Canada is the EU Ecolabel, a label administered by the European Commission. Participation is voluntary, and requires that products submitted for evaluation meet or exceed environmental criteria established through a multi-stakeholder process. Evaluation considers the full life cycle of products from extraction of raw materials, to production, packaging and transport, and through use and ultimate disposal. Through the program, producers are encouraged to generate less waste and CO<sub>2</sub> during the manufacturing process, and to develop products that are durable, and easy to repair and recycle. These product characteristics are recognized as reducing environmental impacts and contributing to goals toward a more circular economy.



Energy efficiency and organic food standards and labels are also administered by the European Commission. Standards development is led by the European Commission in cooperation with representatives from each of the member countries.



## Regulation of Environmental Labels

Environmental claims create an impression through marketing, advertising, logos, or some other form of communication that identified materials fall under one of two categories: 1) a product or service that has a positive impact on the environment, or 2) a product or service that is less damaging to the environment than competing goods or services. Oversight and regulation of claims is standard practice in order to protect the integrity of ecolabels and maintain consumer trust, as well as to avoid unfair competition.

### United States

Within the U.S., oversight of green claims is the responsibility of the Federal Trade Commission (FTC). The Green Guides document provides guidance regarding green claims on products and packaging and in advertising, including personal testimonials. Guidance provided in this document includes: general principles that apply to all environmental marketing claims, discussion of how consumers are likely to interpret particular claims and what marketers can do to substantiate them, and how marketers can qualify claims to avoid deceiving consumers.

The Guides are not regulations so there are no civil penalties associated with them, and some leeway exists in the making of green claims. However, if advertisers deviate from practices as outlined in the guides, the FTC may decide to investigate whether practices are unfair or deceptive under the FTC Act. Under this Act, the Commission is empowered to take corrective action and pursue monetary redress and other relief for conduct judged to be injurious to consumers.<sup>5</sup>

Typically, a number of enforcement actions are initiated each year. Selected examples of FTC enforcement are:

- 2009 – Action against four sellers of clothing and other textile products for claiming products were made of bamboo, when in fact they were made of rayon. These cases resulted in three agreements on the part of companies to end deceptive practices and initiation of litigation in the other.
- 2013 – Action in response to six biodegradable plastic claims on the part of five companies. Triggered by competitor complaints, one of these cases resulted in a \$450,000 civil penalty, while the rest resulted in warnings.<sup>6</sup>
- 2018 – Case brought against Amazon as a result of complaints filed by 22 district attorneys in California, charging “greenwashing” for misleading claims plastic products being biodegradable. Result was a \$1.5 million settlement.<sup>7</sup>

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<sup>5</sup> For further discussion of the Green Guides, see: *The Green Guides: What, Why and How of Green Marketing Claims* (<https://dovetailinc.org/portfoliodetail.php?id=5e2b296e09ae6>)

<sup>6</sup> FTC (2013)

<sup>7</sup> Californians Against Waste (2018)

There is considerable criticism regarding ecolabel oversight and enforcement, and frequent charges of “greenwashing” against various companies for their environmental claims vs actual practices and product attributes. The current guidance framework is said to be sufficiently vague and ambiguous that enforcement actions fail when challenged in court. One proposed solution is to replace the guidance-oriented Green Guides with International Organization for Standardization (ISO) Standard ISO 14021 which provides a stronger, more detailed set of requirements for eco-labeling. The ISO standards have not been adopted in the United States.<sup>8</sup>

### **Canada**

Like the U.S., Canada also has a guidance document regarding environmental claims.<sup>9</sup> And, as in the U.S., information contained in the guidance document does not constitute regulations. Oversight is provided by the Bureau of Competition. When concerns or complaints arise, these are examined on a case-by-case basis, and can result in corrective action and/or civil penalties.

### **Europe**

In the EU, environmental claims guidance is provided by the European Commission and is intended for use by member states. While not legally binding, member state enforcement authorities and advertising self-regulatory bodies may use provisions as an enforcement standard when scrutinizing environmental claims made on goods and services marketed in the EU.

The EU guidelines are more robust than many in that they emphasize that claims made should relate to aspects that are significant in terms of a product’s environmental impact over its entire life cycle and that environmental claims should be substantiated by scientific evidence that is clear and robust. Guidance also suggests that manufacturers be required to provide robust scientific evidence to support claims to enforcement authorities upon their request.

### **Labels and Socially Responsible Consumption**

Fundamentally, socially responsible materials or products are those acquired, produced, and distributed in such a way as to promote human rights, fairness, and decent working conditions throughout material and product global supply chains.

Social responsibility in the marketplace is most well developed in Europe where fair trade and ethical trade are commonly recognized and promoted through product branding. As described by the European Commission, “fair trade initiatives are designed to support marginalized producers in developing countries (most often in the agriculture and handicraft sectors) by improving their market access, guaranteeing fair prices and stability of revenues, and providing direct and advanced payments.” Such products are brought

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<sup>8</sup> DeQuarto (2019)

<sup>9</sup> Government of Canada (2008)

to market through trading organizations that purchase fair-trade items from small producers and cooperatives and then sell them in specialized outlets and through the use of fair trade branded or certified products that are sold through normal commercial channels.

Ethical trade focuses on such issues such as labor rights throughout supply chains, attention to the well-being of local communities and the rights of indigenous peoples, respect for laws and encouragement of ethical behavior within countries of origin, as well as environmental protection. Determination of adherence to ethical trade standards on the part of manufacturers or suppliers is based on monitoring, auditing, and/or certification judged against codes of compliance. An example of ethical trade labels is provided by those targeting the use of child labor in the production of rugs, clothing, toys, and other items.

Well known social responsibility and ethical trade labels include Certified B-Corp, Fair Trade and Fair Trade Certified, Oxfam, World Fair Trade, Equal Exchange Fairly Traded, Fair for Life, and the Flower Label Program. An indication of the scope of such programs is provided below in further discussion of the first three of these.



### **Certified B-Corporation**

A company can achieve Certified B-Corporation certification if it is in compliance, as confirmed through independent third-party verification, with a standard encompassing social sustainability, environmental performance, accountability, and transparency. Such certification applies to an entire company across all product lines and issue areas, and companies earning this certification may display the B-Corporation certification label on their products and in their communications.

### **Fair Trade**

While a brief description doesn't do justice to the full scope of the Fair Trade label, this label essentially identifies apparel and home goods products that have been produced by companies in which workers enjoy fundamental rights in the workplace and are empowered in negotiations with management, workers are compensated fairly, internationally recognized labor standards are upheld, and healthy and safe working conditions are maintained. Companies also commit to doing what they can to protect and restore the natural environment and pursue continuous improvement in reduction of waste, water, chemical, and energy use. The Fair Trade Certified label appears on agricultural products such as tea, coffee, cocoa, spices, fruit, and flowers, and cotton. Requirements are basically the same as those under the Fair Trade program, including

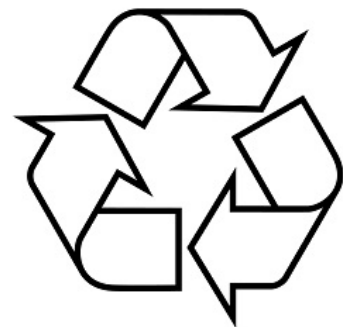
a requirement to operate in accordance with international environmental standards in farming and land stewardship.

### Can Labels Be Trusted?

Keeping in mind that labels regarding products can take the form of statements, symbols or graphics, on-product or package labels, or any of these things in product literature, technical bulletins, advertising, publicity, telemarketing, and digital or electronic media, a relevant question is whether social responsibility and eco labels can be trusted. The answer is mostly yes, but with a caution.

Due to the proliferation of transparent product standards backed by independent third-party verification, as well as government-run labeling programs, the vast majority of product claims made under such programs are trustworthy. Problems remain, however, in regard to ISO-defined Type II labels whereby manufacturers or vendors make unverified self-declarations as to environmental or social responsibility attributes. As noted earlier, while the Federal Trade Commission is empowered with oversight of environmental claims and labels and with enforcement of rules when necessary, critics point to the need for stronger, more definitive standards which would facilitate greater compliance and effective enforcement.

Examples of continuing problems with unverified claims include multiple current instances of the use of vague or ambiguous claims such as 'environmentally friendly', 'earth friendly', or 'more sustainable' in product labeling and advertising. Specific, but unverified claims on items are also common; you need only look through your kitchen pantry to confirm this. Common as well is use of the internationally recognized recycling symbol (Mobius loop). This symbol is used to indicate packaging that is either recyclable or contains



recycled content; if the latter, recycled content is revealed in the center of the loop. While the recycling symbol is widely used and recognized, its use can also be misleading. For instance, most plastic bottles are marked with a recycling symbol, indicating to consumers that the container can be recycled. In fact, however, virtually none of those containers are recycled and few to none contain any recycled content.

There are also challenges when multiple labels fundamentally address the same concern. A case in point is organic food labels. Whereas the USDA Organic label was developed by the government, and thus through a political consensus process, other organic labels which have not been so constrained in their development, have more stringent requirements. For purchasers of organic foods, it is important to research each label individually, whether it be USDA organic or certified naturally grown, to ensure purchasing goals align with the objectives of the program.

The same advice applies to labels in general. If certain products or brands are commonly selected based on claimed environmental attributes, or when considering purchase of a large ticket item, it is a good idea to invest a bit of time to find out what is behind specific product claims or what a given label stands for, and in either case how product claims are verified. Similar investigation is warranted in regard to vague, eco product claims or product line names. The Eco Label Index, referenced earlier, is a good place to start in seeking to learn more about various product labels; searching the internet for information regarding a specific label is also often worthwhile, as doing so can reveal not only what is behind a given label, but critical reviews as well.

## Summary

Hundreds of labels and a proliferation of claims are widely employed to identify environmentally and socially responsible products for consumers. Some are backed by published, transparent standards and independent verification, others are operated and supported by governmental agencies, while still others are simply manufacturer or vendor assertions.

Labels address a wide range of environmental issues that can direct consumer purchasing toward lower impact products and product lines. Another group of labels focuses on worker rights and safety, fair trade and compensation, and environmental stewardship and protection in producing regions.

Government oversight of social responsibility and environmental labels has increased globally over recent decades, improving the veracity of product claims. Evolution of third-party oversight of labels has likewise provided a basis for improved consumer confidence.

While the majority of labels and claims are trustworthy, deceptive and misleading advertising remains a problem. Consumers who wish to reduce the adverse effects of their purchasing should take the time to investigate the labels or claims that they rely on to understand what labels specifically stand for and whether and how claims are verified.



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