

Guidelines for Environmental Representations

[March 2026]

Disclaimer

This document is an English translation of the Guidelines for Environmental Representations, re-edited to make it easier to understand. Please refer to the original Japanese version and ISO standards if you wish to accurately understand the Guidelines.

The Ministry of the Environment

These Guidelines are to give guidance on how to ensure the following environmental representations, etc. for businesses and business associations who make environmental representations, mainly under their self-declarations, and at the same time, to be useful as reference for third party institutions who certify applicable products and services.

- Environmental claims for products or services through explanatory notes, logotypes and diagrams, etc. including “environmental labelling” and “declarations”.
- Environmental representations not directly relating to transactions of products or services (its scope includes business activities, image advertisement and corporate stance, etc.).

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Chapter 1 Purpose of These Guidelines

The environmental issues today including deteriorating global warming, waste problem, endangered biodiversity and depletion of resources are attributed to the structure of production and consumption stood on large-scale production, large-scale distribution, large-scale consumption and large-scale disposal, and therefore, to solve such issues, it is indispensable to transform the economic society itself to the one incorporating environmental considerations into the economic society system, having less environmental burden, and it is also necessary to try to reduce environmental burden at each entity and in each field.

In this context, it becomes an urgent task to reduce the environmental burden relating to products and services supporting our daily lives and economic activities and we need to promote conversion of demand to environmentally friendly products and services (hereinafter referred to as “environmentally friendly products, etc.”). The effective approach to promote such conversion of demand to environmentally friendly products, etc. is Green Purchasing. Green Purchasing contributes to promoting creation and development of markets for these environmentally friendly products, etc. which brings a ripple effect having continuous improvement, further promoting the purchase of environmentally friendly products, etc. To promote Green Purchasing, it is necessary for businesses, etc. to provide proactive environmental information to consumers on the premise that such information is verifiable, accurate and not being misunderstood. By ensuring the market’s fair competition through appropriate environmental representations by businesses, etc., it is expected that consumers can trust environmental representations, that reasonable and voluntary choices are promoted, that more and more environmentally friendly products, etc. are provided and that it leads to virtuous cycle toward healthy market growth.

In addition, it becomes required for companies to disclose information relating to sustainability from financial institutions and investors, mainly for companies listed on Prime Market, in particular, following the recent announcement of such sustainability disclosure standards as SSBJ Standards¹, etc. Under such circumstances, it is considered as approaches to demonstrate companies’ reliability to ensure appropriate environmental representations.

These Guidelines are to summarize such details for businesses, etc. to address to ensure that businesses, etc. providing environmentally friendly products, etc. to the market and promoting environmentally friendly approaches are evaluated and preferred, to review various environmental information communicated mainly from businesses to consumers indispensable to lead to such economic society’s transformation as Green Purchasing and to promote providing environmental information beneficial to both businesses and consumers.

In addition, these Guidelines explain a part of guidelines relating to environmental representations as well as voluntary standards, etc. in various countries and regions in the Annex (reference information), considering such cases for overseas marketing purposes by companies, etc. having global businesses or such cases where small and medium-sized companies having the domestic market as their main business field are requested such information from business partners, etc. within their supply chain.

¹ SSBJ, established in July 2022, announced in March 2025 such three standards as sustainability disclosure universal standards, “Application of the Sustainability Disclosure Standards”, standard No. 1 by sustainability disclosure theme, “General Disclosure Standards” and standard No. 2 by sustainability disclosure theme, “Climate-related Disclosure Standards”.

1-1 Background of Formulation

In Article 12 of “The Act on Promotion of Procurement of Eco-Friendly Goods and Services by the State and Other Entities” (hereinafter referred to as “The Green Purchasing Act”) enacted in May 2000, it is specified that a person who engages in the business of the manufacture, import, or sale of goods, or the provision of services, is to endeavor to provide purchasers, etc. of the goods with information necessary for understanding environmental load pertaining to the goods, etc. by an appropriate method, and in Article 13, it is specified that a person who certifies the fact that goods manufactured, imported or sold by, or services provided by other business operators, contribute to the reduction of environmental load, or who provides information concerning Eco-Friendly Goods, etc. by conducting acts including indicating information concerning environmental load pertaining to such goods and services is to endeavor to provide information effective and appropriate for contributing to a shift of demand to Eco-Friendly Goods, etc., in light of scientific knowledge and in consideration of consistency with international agreements. In addition, in Article 14, it is specified that in order to contribute to a shift of demand to Eco-Friendly Goods, etc., the State is to arrange and analyze the status of the provision of information conducted by persons prescribed in the preceding two Articles and provide the results thereof, as the State’s arrangement, etc. of environmental information.

In addition, in (2) of Supplementary Provisions of this Act, it is specified that the government is to review the roles of the system for providing information concerning Eco-Friendly Goods, etc., including measures for securing the provision of proper information etc., and implement necessary measures based on the results thereof, while respecting the content of information concerning Eco-Friendly Goods, etc. to be provided and the method of provision, as well as the autonomy of the person providing information concerning Eco-Friendly Goods, etc. Also in the 1st Basic Plan for Establishing a Sound Material-Cycle Society formulated based on the Basic Act for Establishing a Sound Material-Cycle Society, it is specified that the government is to review the details of information relating to green products and services and the method to provide such information, the information provision system including approaches to ensure provision of appropriate information, and to take required measures based on the review result.

On the other hand, in the Basic Plan for Consumer Policies (formulated in April 2005, revised in July 2012) formulated based on the Basic Act on Consumer Policies, it is specified that the government is to continuously review the expected approaches relating to the method and the details on provision of environmental information by businesses, etc. including environmental labelling, and it is required to review the provision method and its details for environmental information making it easier for consumers to choose environmentally friendly products, etc.

Responding to these circumstances, Ministry of the Environment established a “preparation and review committee for Guidelines for Environmental Representations” composed of experts, related-industry personnel and related government offices on environmental representations ideal for both businesses and consumers, sorting out and reviewing international trends and various issues on environmental representations and formulated “Guidelines for Environmental Representations” in January 2008. In addition, we added case studies, etc. in November 2009 and made a revision in March 2013.

Recently, greenwashing has been under stricter scrutiny in Europe, etc. and each country is streamlining and reinforcing guidelines to prevent greenwashing. In 2017, UNEP publicly disclosed “The Guidelines for Providing Product Sustainability Information” and in 2021, UK announced Green Claims Code. Also in 2022, The US initiated public comments toward revision of “Green Guides”. Regarding ISO14020 series, the international standards on environmental declarations and labelling, in 2022, the revised version of ISO14020 (Product environmental declarations and programs -

Principles and general requirements) was published and as of November 2025, works are under way to revise ISO14021 (Environmental labelling and declarations -- Self-declared environmental claims (Type II environmental labelling), ISO14024 (Environmental labelling and declarations--Type I environmental labelling--Principles and procedures) and ISO14025 (Environmental labelling and declarations - Type III environmental declarations--Principles and procedures).

Following such circumstances, we made a revision considering the international trends, etc. on countermeasures against greenwashing in March 2026.

We try to diffuse and promote utilization of these Guidelines through publication on the website of the Ministry of the Environment, industry associations and consumer associations, and to ensure continuous improvement by accumulating opinions, etc. from various stakeholders.

1-2 Purpose of Formulation

These Guidelines are mainly meant for businesses and business associations having environmental representations as main target and sort out and summarize how to provide information required when promoting Green Purchasing, in parallel, being a reference for third party institutions, etc. to make certification on products and services². More concretely, its purposes are (1) to let environmental representations function as beneficial information that can be easily understood and emphasized by consumers, and (2) to establish a structure for each business and business association to provide appropriate environmental information, and to enhance mutual understanding on environmental information with various stakeholders.

In the 6th Basic Environment Plan approved at a cabinet meeting in May 2024, it is specified in the development of environmental policies by key strategy to establish a green economic system to materialize sustainable production and consumption bringing “new growth”, and in the Plan, it is emphasized to promote providing green products and services, etc. having high environmental value and international competitiveness while the expansion of overseas environment-related markets such as decarbonization is expected, and to generate additional competitive advantage by substantially reducing environmental burden in the entire value chain through strengthening circularity and efficient energy usage, etc. and to be a driving force for our country’s economy. These Guidelines ensure, in principle, initiatives of each business and business association, however, it is inevitably required to conform to international standards relating to environmental representations to pursue expansion of environmental technologies and products, etc. overseas and domestically.

² These Guidelines have such descriptions as “products”, “services” and “goods”, “services” and such expressions as “products” and “services” are taken from ISO/JIS Q 14020 series and “goods” and “services” are used in the explanation relating to the Act against Unjustifiable Premiums and Misleading Representations. Also, “services” are partially used in the description relating to the Green Purchasing Act.

As previously mentioned, greenwashing has been under stricter scrutiny in Europe, etc. and in the US and Europe, such cases as a substantial financial penalty and collective lawsuits by consumer associations, etc. are increasing, and in Japan also, there was an administrative order based on the Act against Unjustifiable Premiums and Misleading Representations in 2022. In this context, it is necessary to maintain international competitiveness of Japan's excellent environmental technologies and environmentally friendly products, and for our country's companies to promote environmentally friendly products, services and approaches overseas and domestically without hesitation and to promote appropriate environmental representations contributing to establishing green economic system, as indicated in these Guidelines.

These Guidelines present conformity with international standards on environmental representations (ISO/JIS Q 14020 series) as the basic concept relating to expected approach by businesses and business associations mainly in providing environmental information to consumers. However, at the current stage, there are quite a few cases where we cannot see appropriate environmental representations conforming to international standards. Therefore, for businesses who do not have necessarily sufficient environmental representations, it is required to aim at appropriate environmental representations ensuring accuracy and reliability and to take steps for continuous quality improvement.

We expect that, by utilizing and diffusing these Guidelines, a communication between businesses and consumers through environmental representations will accelerate, a demand shift to environmentally friendly products, etc. will be promoted and it will lead to creating a sustainable society.

Chapter 2 Targets and Applicable Scope of These Guidelines

2-1 Targets

The targets of these Guidelines are mainly businesses and business associations who ensure environmental representations under their self-declarations (hereinafter referred to as “businesses, etc.”) and the details are as follows.

“Businesses, etc.” who are the targets of these Guidelines are manufacturing businesses, import businesses, sales businesses and such business associations.

“Business associations” are “business associations” stipulated in Article 2 (2) of the Act on Prohibition of Private Monopolization and Maintenance of Fair Trade (hereinafter referred to as “The Antimonopoly Act”) and shall mean associations setting unified environmental representations or make a certification for such related parties as association member businesses. Business associations are organizations in which businesses who receive direct benefits through representations participate and as we cannot define them as independent third parties³, we include them in businesses, etc.

”Business associations”

“Business associations” shall mean a combination or a federation of two or more businesses having an increase of common benefits as businesses as their main purpose and shall include those having the following types (Article 2 (2) of the Antimonopoly Act)

- ① Incorporated associations and other associations who have two or more businesses as their employees (including those who are equivalent to employees)
- ② Incorporated foundations and other foundations who have two or more businesses controlling appointment and dismissal of their trustees or administrators, execution or existence of their business operations
- ③ Unions who have two or more businesses as their union members or combinations of two or more businesses under agreement

More concretely, they include such federations of associations as AA industry association, BB society, CC council, DD union and EE federation.

“Common benefits as businesses” in this context shall mean benefits directly or indirectly contributing to benefits relating to member businesses’ economic activities regardless of practical benefit for each business or general benefit for industry. In this regard, it shall not include academic associations, social welfare associations and religious associations, etc. who do not have an increase of common benefits as businesses as their purpose even if they are combinations of two or more businesses. (“Guidelines under the Antimonopoly Act on activities of business associations” October 1995, revised in January 2026)

On the other hand, for environmental representations operated by such third-party institutions as government bodies, public interest corporations and NPO, there are such systems as environmental labelling (ecolabel) in accordance with the ISO 14024 standards represented by Eco Mark, energy-saving labelling and international energy star program operated by public institutions. In addition, there are such systems operated by non-profit organizations as FSC, one of the forest certification

³ In ISO, “third party” is defined as “individual or association deemed as independent from those who are related to issues under discussion” (ISO14024: 2018).

systems, and MSC certification system for marine products. In case these institutions, etc. make a certification relating to environmental aspects of products, etc., permission to use environmental labelling, etc. is given to businesses who go through such steps as designated application, examination and certification. Such systems as environmental labelling for certification have their own representation criteria based on environmental impact and in case businesses, etc. effect such representations as environmental labelling to their products and services, they are required to comply with such criteria, therefore, the third-party institutions, etc. operating such certification systems are expected to give appropriate guidance on environmental representations made by businesses, etc. referring to such rules as these certification systems and these Guidelines. In addition, these institutions, etc. making a certification are expected to use such systems as environmental labelling referring to applicable standards in ISO/JIS Q 14020 (general principle), ISO/JIS Q 14024 (type I environmental labelling), ISO/JIS Q 14021 (self-declared environmental claims) and ISO/JIS Q 14025 (type III environmental declarations).

The logotypes⁴ that businesses can voluntarily use in case they comply with criteria and usage conditions, etc. set by private associations or NPO, etc., not through certification systems, are in scope of these Guidelines.


Reference

Examples of environmental labelling by third-party institutions

→ “Eco Mark”

In Japan, “Eco Mark System” launched since 1989 by The Japan Environment Association, a public interest incorporated foundation, is the 1st environmental labelling in Japan and the only system in Japan conforming to ISO 14024 standards as environmental labelling. The Eco Mark System allows only products, etc. certified as useful for environmental preservation by the Association, having little burden on the environment through the entire lifecycle (raw material collection, production, distribution, usage, recycling and disposal) of such products, etc. to have Eco Mark, and its certification criteria are determined by type of products.


(The Japan Environment Association, a public interest incorporated foundation, “Eco Mark Secretariat” <https://www.ecomark.jp/>)



Eco Mark

→ “SuMPO EPD”

SuMPO EPD quantifies environmental information for products and services using LCA (lifecycle assessment) method and evaluates environmental impact in various fields including carbon footprint⁵. EPD is based on ISO 14025 and makes third-party verification on LCA information, and the product environmental information passed through the verification is publicly disclosed on its website. EPD is used as judgment criteria for procurement being highly transparent and fair environmental information, and used by manufacturers for development and production, etc. of products



SuMPO EPD

⁴ For example, it includes “Mark for usage of recycled paper (R)”.

3R activity promotion forum “Mark for usage of recycled paper (R)” https://3r-forum.jp/activity/r_mark/index.html

⁵ Refer to the claim on carbon footprint (CFP) in reference ① on Page 19.

having less environmental burden. EPD exists in each country globally and in Japan, EPD Program (ex-Eco-leaf) was launched in 2002, and is currently operated by SuMPO (Sustainable Management Promotion Organization, general incorporated association).

(Sustainable Management Promotion Organization, general incorporated association (SuMPO) “SuMPO EPD” <https://ecoleaf-label.jp/>)

2-2 Applicable Scope

It is necessary to inform consumers on which points products and services are environmentally friendly by providing appropriate information, and in particular, it is an effective way to inform information on environmental consideration through “representations” on products and services.

In general, “representations” shall mean advertisement and indication in total for businesses, etc. to let consumers buy their products and services, by informing them of the details of products and services and their trade conditions, etc. “The Act against Unjustifiable Premiums and Misleading Representations (hereinafter referred to as “The Premiums Representations Act”)” was enacted to ensure fair competition and protection of general consumers’ benefits defines as follows.

Representations defined in Article 2 (4) of the Premiums Representations Act

Representations as used in Article 2 (4) of this Act mean advertisement or any other representations which businesses make as a means of inducing customers, with respect to the substance of the goods or services which they supply, specified as follows.

1. Advertisement and other representations by goods, containers or packaging and advertisement and other representations by labelling, etc. attached to them
2. Advertisement and other representations by samples, brochures, pamphlets, explanatory documents and others similar to those (including those through direct mail and fax transmission) and oral advertisement and other representations (including those through telephone)
3. Posters, signboards (including placards and those described on buildings, trains or vehicles, etc.) and advertisement through neon signs, advertising balloons and others similar to those and advertisement through displays or demonstrations
4. Advertisement through newspapers, journals and other printed materials, broadcasting (including broadcasting through wired electronic communication facilities or loudspeakers), movies, theaters or electric light
5. Advertisement and other representations through devices used for information processing (including those through internet, personal computer communication, etc.)

“To designate premiums and representations based on the provision of Article 2 of the Act against Unjustifiable Premiums and Misleading Representations” Notice No. 3 Japan Fair Trade Commission 1962

However, the scope of the Premiums Representations Act is “the transaction of goods or services which businesses supply” and therefore, for example, the advertisement not relating to goods or services (those issued to shareholders, corporate advertisement not relating to goods or services) are not in scope.

In addition, “environmental representations” shall mean items explaining such characteristics as points considered for environment and environmental burden reduction effects at such stages as raw material collection, production, distribution, usage, recycling and disposal, which are made using logotypes, diagrams, etc. Environmental representations include “environmental labelling” and declarations” and all the environmental claims for products and services through explanatory documents, logotypes and diagrams.

Such environmental representations can be found through products, packaging, catalogs, in-store advertising, in-store representations, such advertising media as websites, TVs and newspapers. In Japan, as representations relating to environmental aspects are collectively expressed as “environmental representations”, “environmental claims” stated in such international standards as ISO/JIS are included in environmental representations, as mentioned later.

These Guidelines assume the above-mentioned environmental representations as main applicable scope. In case businesses, etc. indicate their conformity with regulations and self-regulations, etc. at each stage of lifecycle for environmentally friendly products, etc., their extent of improvement in environmental characteristics or attributes or their quantitative effects, etc. on environmental burden reduction, all of these are in scope of these Guidelines.

In addition, as such representations indicating the attitude and the image toward environmental considerations of businesses, etc. are likely to give a substantial impact on consumers, the environmental representations in these Guidelines shall include representations not directly relating to transactions of goods and services in addition to the afore-mentioned “representations”. In other words, the applicable scope of these Guidelines shall include all the environmental representations under which information is communicated to consumers through business activities and promotional or marketing activities, etc. for products and services.

“Representations”

Advertisement and representations in total for businesses to let consumers buy their products and services informing them of the details and trade conditions, etc. as defined in the Premiums Representations Act

“Environmental Representations”

Environmental claims for products or services through explanatory documents, logotypes and diagrams including “environmental labelling” and “declarations”

Applicable Scope of “Environmental Representations Guidelines”

It includes environmental representations not directly relating to the transactions of goods and services (business activities, image advertisement and corporate attitudes, etc.) in addition to environmental representations subject to the Premiums Representations Act

In addition, for principles and procedures, etc. to ensure conformity with judgement criteria relating to the Green Purchasing Act, “Guidelines for Ensuring the Reliability of Labeling for Specified Procurement Items⁶” (refer to the reference information) summarizing approaches required for manufacturing businesses, etc. are formulated to ensure reliability on representations for specified procurement items, etc., and therefore, it is necessary to make conformity evaluation and representations referring to such guidelines.

⁶ <https://www.env.go.jp/policy/hozen/green/g-law/net/trust.html>



Chapter 3 Requirements on Environmental Representations

Environmental representations are information provisions using environmental labelling, etc. to indicate the products and services are environmentally friendly and unless such information is provided by businesses, etc., consumers would not know it. Therefore, businesses, etc. are required to proactively provide information on environmental performance for their products and services upon ensuring assured reliability in them⁷.

These Guidelines aim to establish an information provision system beneficial for both businesses and consumers by offering the details to be conformed in making environmental representations while respecting autonomy of businesses, etc.

The effects brought by appropriate environmental representations are as follows.

- To prevent unjust environmental representations such as false and exaggerated ones
- To ensure reliability and transparency of environmental representations
- To let consumers proactively use environmental representations
- To promote development of environmentally friendly products
- To promote proactive green purchasing

 Reference 

Expected environmental representations suggested by the Japan Fair Trade Commission and the Japan Association of Consumer Affairs Specialists [refer to reference information for the details]

① The Japan Fair Trade Commission

The Japan Fair Trade Commission publicly announced “Report on the Actual Conditions of Advertising Displays for Environmentally Friendly Products” in 2001 and presented 5 items to be noticed on advertising displays indicating consideration to environmental preservation in the report.

② The Japan Association of Consumer Affairs Specialists

The Japan Association of Consumer Affairs Specialists summarizes “Environmental information that consumers expect – 9 principles” (formulated in 2006, revised in January 2026)
Website of the Japan Association of Consumer Affairs Specialists <https://nacs.or.jp/>

⁷ In Article 12 of “the Act on the Promotion of Business Activities with Environmental Consideration by Specified Corporations, etc. by Facilitating Access to Environmental Information, and Other Measures (the Act on the Promotion of Environmental Consideration)”, it is stipulated that businesses are required to provide information on reduction of burden to environment relating to products and services.

3-1 International Standards on Environmental Representations

International Organization for Standardization (ISO)⁸ publishes “Environmental statements and programs for products” series as international standards on environmental representations with a view to stimulate the potential for continuous environmental improvement led by the market. There are 3 types in the “Environmental statements and programs for products”, which define each definition and requirements. In addition, it defines common general principles.

Table 3-1 “Environmental statements and programs for products” standardized by International Organization for Standardization (ISO)

Applicable standards (year of adoption) and name in ISO	Characteristics	Details
ISO14020:2022 Environmental statements and programs for products – principles and general requirements	Guiding principles	<ul style="list-style-type: none"> • It requires to be used together with other standards in ISO14020s (14024, 14021, 14025) • It cannot be used for certification or registration. Remarks: JIS Q 14020 was enacted in 1999 based on ISO14020:1998. As of March 2026, ISO14020: 2022 has not been made into JIS.
ISO14024:1999 Environmental labelling and declarations – Type I environmental labelling display – principles and procedures	Environmental labelling by third party certification	<ul style="list-style-type: none"> • Operated by third party execution institutions • Execution institutions determine product classification and judgment criteria. • Gives permission to use the mark responding to applications by businesses Remarks: It was enacted as JIS Q 14024 in Japan in 2000.
ISO14021:1999 Environmental labelling and declarations – self-declared environmental claims – (Type II environmental labelling display)	Self-declared environmental claims by businesses, etc.	<ul style="list-style-type: none"> • To evaluate conformity to own company’s standards and to claim products’ environmental improvement to the market • Also to apply to advertising for products and services • No judgment by any third party • It can be claimed by manufacturing businesses, import businesses, distribution businesses, retails businesses and all the others who benefit from environmental claims Remarks: It was enacted as JIS Q 14021 in Japan in 2000. ISO14021 was supplementarily adopted in December 2011 (ISO14021: 1999/Amd.1:2011)
ISO14025:2006 Environmental labelling and declarations – Type III environmental declarations – principles and procedures	Representation of quantitative data on environmental burden in products’ lifecycle	<ul style="list-style-type: none"> • It does not judge whether being passed or not • To represent only quantitative data • Judgment is left to purchasers Remarks: It was enacted as JIS Q 14025 in Japan in 2008.

⁸ International Organization for Standardization is a private NPO aiming at global standardization and development and promotion of its related activities to make international exchange of products and services easier and to support international cooperation in academic, scientific, technological and economic activity fields.

<https://www.iso.org/home.html>

ISO/JIS Q 14021 (hereinafter referred to as “Self-declared environmental claims”) are international standards used when businesses, etc. make self-declaration of information on environmental aspects of their products and services and currently there are a lot of environmental representations falling under ISO/JIS Q 14021 in the market.

Self-declared environmental claims are not subject to any third-party certification. As all the claim details are left to the judgment of businesses, etc., it is important to ensure reliability and transparency of environmental information. However, actually, there are several environmental representations not conforming to the requirements of ISO/JIS Q 14021 standards among products and services available in the market. This is due to the reason that the standards themselves are not known to public, or that it is regarded as not absolutely necessary to conform to the standards, though it is desirable to conform to them, which may be one of the reasons why the standards are not proactively followed.

As environmental representations provide direct basis for judgment to consumers wishing to purchase environmentally friendly products, etc., its meaning and responsibility is substantial and it is important to share, at least, common rules. In addition, it is inevitably important to conform to international standards regarding environmental representations to widely diffuse our country’s environmental technologies and products, etc. and to contribute to environmental burden reduction globally in future. Therefore, all the businesses, etc. having self-declared environmental representations are expected to ensure representations conforming to international standards, ISO/JIS Q 14020 (general principles) and ISO/JIS Q 14021 (self-declared environmental representations).

Among the environmental labelling and declarations in Japan, Ecolabel (ISO/JIS Q 14024) and Type III environmental declarations (ISO/JIS Q 14025) are managed by third-party institutions through certification programs based on corresponding international standards, therefore, these Guidelines mainly explain requirements for self-declared environmental claims (ISO/JIS Q 14021).

3-2 Requirements for Self-declared Environmental Representations

These Guidelines require that, in principle, self-declared environmental representations should conform to such international standards as ISO/JIS Q 14021 standards.

Businesses, etc. who have environmental representations not conforming to ISO/JIS Q 14021 standards at this moment are required to take concrete steps to make them environmental representations fulfilling requirements of ISO/JIS Q 14021 standards as early as possible referring to these Guidelines.

We explain necessary conditions for making environmental representations, citing from the details of JIS Q 14021. For the details, please make sure to check JIS Q 14021.

(1) Structure of ISO/JIS Q 14021 Standards

ISO/JIS Q 14021 standards are structured as follows.

0. Preface
1. Applicable scope
2. Cited standards
3. Terms and definitions
4. Purpose of self-declared environmental claims
5. General provisions
6. Requirements on evaluation and verification
7. Specific requirements for selected claims

In “0. Preface” of these standards, it is described that, for self-declared environmental claims, it is indispensable to ensure reliability, that it is important to appropriately make verification to avoid such negative impact to the market as trade barriers, unfair competition which might occur due to unreliable and deceptive environmental claims, and the evaluation method used for making environmental claims should be clear, transparent, scientifically appropriate and well documented.

Also, in “1. Applicable scope”, for the applicable scope of ISO/JIS Q 14021 standards, requirements for self-declared environmental claims for products including explanatory documents, logotypes, and diagrams, terms and usage conditions commonly used for environmental claims and the evaluation and verification method for self-declared environmental claims are defined.

In addition, in Clause 4, the purpose of self-declared environmental claims is stated as promoting demand and supply of products having less environmental burden and stimulating the potential for continuous environmental improvement led by the market through communication of verifiable, accurate non-misleading information.

“Self-declared environmental claims” are defined as environmental claims that can be made by manufacturing businesses, import businesses, distribution businesses, retail businesses and all the other people who can receive benefits through environmental claims, not requiring independent third-party certification (ISO/JIS Q 14021 3.1.13).

(2) Five Basic Items Specified in These Guidelines

In “5. General provisions” of ISO/JIS Q 14021 standards, it is defined that these standards are applicable to all the environmental claims made by claimers under their self-declarations. Also, for specifically selected claims (possible to compost, degradable and recyclable, etc.), these requirements are applicable.

For requirements in case of making claims using specific terms, we will explain later in (3).

These Guidelines define requirements of ISO/JIS Q 14021 standards for businesses, etc. who make self-declared environmental claims as the following 5 basic items.

[5 basic items]

① Not to make ambiguous expressions and environmental claims

✗ Expressions that cannot be used independently

- Safe to environment
- Environmentally friendly
- Earth-friendly
- No pollution
- Green
- Nature-friendly
- Ozone-friendly
- Sustainable
- Not containing XX, etc.



○ Examples of ideal expressions

- Using 70% recycled plastics for product main body
- Reducing annual energy consumption by around 5% *compared with our company's previous product XX
- Carbon footprint XXkg-CO2e per 1 liter of milk the scope of calculation is raw material procurement ~ disposal / recycling ▼[calculation report can be found here](#)



② To add explanations in the details of environmental claims

Company XX addresses reducing plastics.



- To add explanation
- It is possible to compare and comparison subject
- Claim is clear

We reduced the weight of plastics for bottle (excluding cap and labelling) by 5g and mixed 70% or more recycled materials, compared with our previous equivalent product.

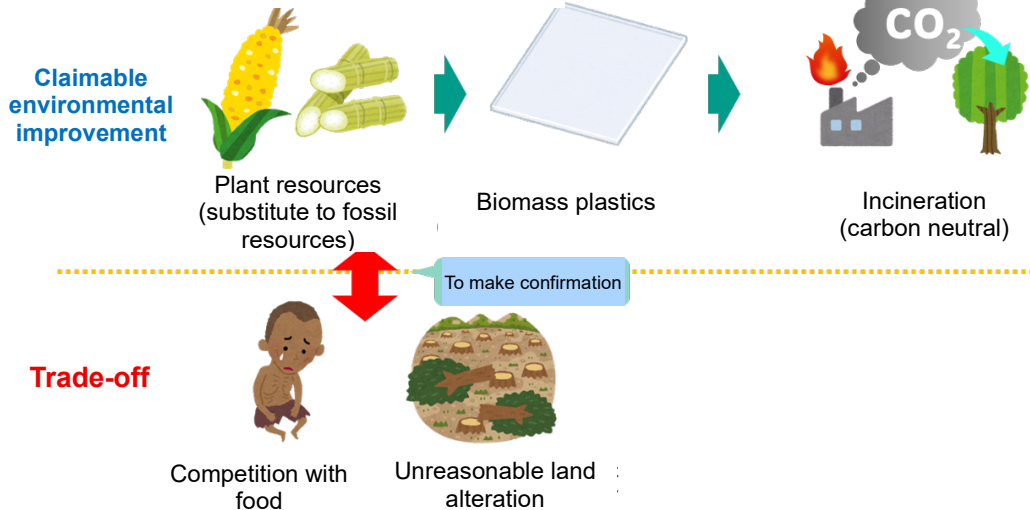
Mass ratio for product or packaging
*it is possible to state "XX or more" if variable

[Reasonable base (example)]
test results
supplier certification (material certification, delivery notes, etc.)
Academic documents

③ To consider entire lifecycle of products

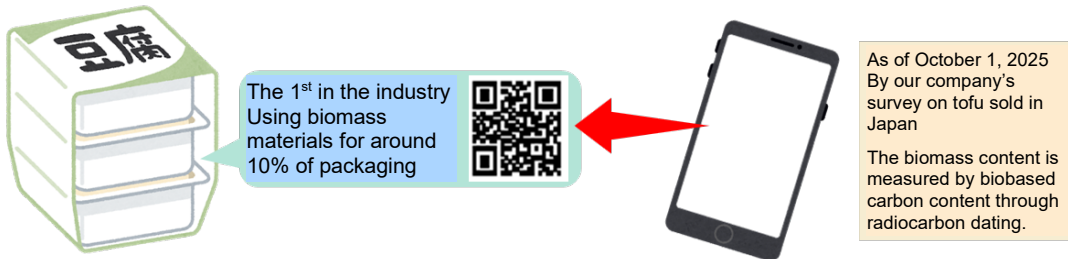
It is expected to confirm if claimable environmental improvement will not bring substantial trade-off.
*This does not necessarily mean that it is necessary to make lifecycle assessment.

Example) Use of biomass plastics and trade-off



④ It is possible to provide necessary data and the evaluation method for verification of environmental claims and accessible to such information

It is important for consumers, etc. to easily access to the data and the evaluation method supporting such environmental claims



⑤ Comparative claims for products or processes should be appropriately made with LCA evaluation and values, etc.

To make a comparison with percentage (%) or absolute value and the improvement in products and the improvement in packaging are claimed separately.



We describe the details of each basic item as follows.

(3) Specific Requirements for ISO/JIS Q 14021 Standards

① Not to make ambiguous expressions and environmental claims

a. Expressions that cannot be used for self-declared environmental claims

ISO/JIS Q 14021 standards (5.3) state that claims roughly implying environmental considerations with such ambiguous expressions as “environmentally friendly”, “earth-friendly” and “green” should not be made. By using such ambiguous claims or beautiful natural images, designs or logotypes, it may give consumers such an impression as being environmentally friendly. Therefore, ambiguous expressions and environmental claims must be avoided. If used, they must not be presented in isolation and must be accompanied by a reasonable explanation.

b. Claims using specific terms

For the following 16 terms widely used for environmental representations in general, ISO/JIS Q 14021: 1999/Amd.1: 2011 “7. Specific requirements for selected claims” define their interpretations and conditions for their usage, etc.⁹ In case these terms are used for claims, it is required to use them without giving any misunderstanding to information receivers, referring to the requirements stated in ISO/JIS Q 14021 7.

We explain using “2. Degradable” as example as follows.

“Degradable” is applicable in claiming all kinds of degradations including biodegradability and photolytic. For example, there is such a claim for a certain product that it can be naturally degraded by a microorganism, etc. after a certain period of time by burying it in the ground without making such disposal treatment as incineration. In Type II standards, this claim cannot be made even if it is actually proved to be “degraded” through specific experimental method, in case a substance with toxic concentration to environment is emitted through degradation process.

Among “16. Claims on greenhouse gas emissions”, for claims on carbon footprint (CFP), it is necessary to conform to the carbon footprint representation guide (February 2025, the Ministry of the Environment, the Ministry of Economy, Trade and Industry) and ISO14067¹⁰, not to ISO/JIS Q 14021 standards. Similarly, for claims on carbon offsetting, it is necessary to make representations following “carbon offsetting in Japan (guidelines) – 4th version – (March 6, 2024, the Ministry of the Environment)”, “carbon offsetting guidelines Ver.3.0 (March 6, 2024, the Ministry of the Environment)” and such appropriate ISO standards as ISO14068-1¹¹.

⁹ ISO 14021: 1999/Amd.1: 2011 “3. Terms and definitions” newly define the following terms (this revision is not reflected in JIS Q 14021). 1. Biomass, 2. Greenhouse gas / GHG, 3: offsetting, 4. Sustainable development

¹⁰ It is a method conforming to international standards for lifecycle assessment (LCA) (ISO14040, ISO 14044) and an international standard defining principles, requirements and guidelines to report by quantifying products’ CFP. It is not allowed to use carbon offsetting when calculating CFP.

¹¹ An international standard to provide principles, requirements and guidelines for achieving and verifying carbon neutral. In case carbon offsetting is required to achieve carbon neutral, the carbon credit used for offsetting can be used only after reducing GHG emissions and GHG removal enhancement following the carbon neutral management plan, and at the same time, it should fulfill specific requirements.

● Reference ●

① Claims on carbon footprint (CFP)

Carbon footprint (CFP: Carbon Footprint Product) is a value obtained by converting GHG emissions through the entire lifecycle from raw material procurement for products and services to disposal and recycling to CO₂ emissions.

“Carbon footprint representation guide (the Ministry of the Environment, the Ministry of Economy, Trade and Industry, February 2025)” states the concept on information provision for CFP representation method and calculation. In the guide, basic principles required for CFP representation are summarized in the following 5 items.

[Basic principles for CFP representation]

● Reliability / credibility

To provide credible information by a reliable calculation method. In doing so, it is to focus on adaptability, practicality and cost-effectiveness while keeping technical reliability.

- Adaptability: To flexibly review CFP values and representations along with changes in factors influencing CFP results
- Practicality: CFP calculation and representations are realistic from practical viewpoint.
- Cost-effectiveness: Balance between the cost of CFP calculation and representations and effects of such representations

● Lifecycle

To consider all the lifecycle stages of products and services

● Comparability

To aim to achieve comparability among products and services having same functional units or declaration units *1 within the same product and service groups in future

● Transparency

It is possible to confirm information on how represented CFP is calculated through quantitative information and explanatory documents

● Regionality

To consider the possibility that CFP values may vary depending on the location where manufacturing, usage and disposal are made

*1 Functional unit: Unit per product's performance (example: per 1 can of paint having 98% opaque and 5-year durability on type A wall of 20m²)

Declaration unit: Unit per number or volume such as 1 product or 1kg of product (used for intermediate product in general)

▶ “Carbon footprint representation guide” <https://www.env.go.jp/content/000286660.pdf>



XXkg-CO₂e per 1 liter of milk the scope of calculation is raw material procurement ~ disposal / recycling

calculation report can be found here

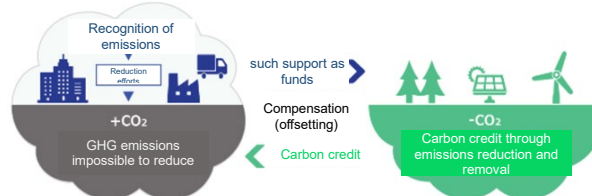
Example of images for CFP representations and provision of supporting information

② Claims on carbon offsetting

Carbon offsetting is for such members of society as citizens, companies, NPO/NGO, local governments and the national government to recognize their own GHG emissions and to make efforts to proactively reduce them and to offset the entire or a part of such emissions through

carbon credits, etc. for a part of emissions difficult to reduce, in other words, an approach of “recognizing, reducing and offsetting”. Firstly, those who make carbon offsetting are required to take steps to reduce emissions as much as possible, recognizing their own emissions, and it should not be used for justification of not reducing emissions by themselves.

The Ministry of the Environment explains basic concepts and procedures required to make highly reliable carbon offsetting and publicly discloses “carbon offsetting in Japan (guidelines) – 4th version – “(hereinafter referred to as “offsetting guidelines” and “carbon offsetting guidelines Ver.3.0” promoting carbon offsetting approaches in line with them. In the offsetting guidelines, it is stated that the following 6 items are important to ensure reliability for carbon offsetting approaches, and claims on carbon offsetting are expected to be made in line with these items.



Concept diagram for carbon offsetting

[Offsetting guidelines]

1. It is necessary to calculate emissions generated by activities subject to carbon offsetting with a certain level of accuracy.
2. Carbon offsetting should not be used for justification of not reducing emissions by own efforts.
3. It is necessary to ensure certainty and permanence of emissions reduction and removal by the project generating credits used for carbon offsetting and to calculate such emissions reduction and removal with a certain level of accuracy.
4. It is necessary to avoid double registration of the project that generates credits used for carbon offsetting and to avoid double issuance of credits generated from materialized reduction and removal and to prevent the same credit from being used for plural carbon offsetting approaches.
5. It is necessary to provide appropriate information on carbon offsetting approaches.
6. It is necessary to ensure transparency for carbon offsetting providers’ activities.

- ▶ “Carbon offsetting in Japan (guidelines) – 4th version – ” <https://www.env.go.jp/content/000207718.pdf>
- ▶ “Carbon offsetting guidelines Ver.3.0” <https://www.env.go.jp/content/000209289.pdf>

Please make sure to check overseas regulatory trends in case of making claims on carbon offsetting outside of Japan.

② To add explanations in the details of environmental claims

ISO/JIS Q 14021 standards (5.6) state that self-declared environmental claims should additionally carry explanations if there may be any misunderstanding only with the claims (claims can be made without explanations only when they are valid without limiting conditions under all the predictable circumstances). In addition, the usage of such explanations should follow all the specified requirements (JIS Q 14021 5.7).

In many cases, such representation spaces as product labelling are limited and, therefore, it is possible to make it easy for consumers to access detailed information through 2D codes, etc.

From the requirements for explanations on environmental claims stated in ISO/JIS Q 14021 standards (5.7), we indicate explanations and examples on typical specified requirements as follows.¹²

a) It should be accurate and should not give any misunderstanding

There are a lot of representations claiming that such recycled resources and materials as recycled paper (used paper) or recycled plastics are used for products' materials or raw materials, etc. Some clearly state the usage rate of recycled resources and materials in percentage (%) and others only state that they use XX. In case the usage rate is not clearly stated, consumers cannot judge if such a rate refers to a part of the product or 100%, and therefore, it may give a misunderstanding. So, in case of claiming that products use environmentally friendly materials or raw materials, etc., such a usage rate should be clearly stated, and it is necessary to clearly state whether the denominator when showing the percentage refers to the total product volume or the usage volume of materials.

b) It should be proven and verifiable

It is the most important for the details of environmental claims to be “proven” to ensure reliability of the claims. However, actually, there are such cases where sufficient proven data or documents used as proof are not available on the details of environmental claims. It is valid to say that the claims are proven only when reasonable proof and data that can prove the details are secured at the time of such claims. Reasonable proof and data, etc. should comprehensively cover, in principle, information required to prove the claims, and test reports as well as supplier certificates obtained from business partners in the upstream of supply chain (material certificates and delivery notes, etc.) can be regarded as such.

For the details of the environmental claims to be “verifiable”, it is necessary to fulfill requirements indicated in “it is possible to provide data and evaluation method required for verification of environmental claims and it is possible to access such information” of the basic item ④ stated later.

Reference

Requirements for “Documents indicating reasonable proof” under the Premiums Representations Act

In the operational guidelines for Article 7 (2) of the Act against Unjustifiable Premiums and Misleading Representations (Guidelines for Regulations on Advertising Content That Has Not Been Demonstrated), it is stated that in case businesses make representations indicating substantial superiority of benefits and performance for their products and services, they should, in advance, have reasonable proof supporting such representation details. To be recognized as “documents indicating reasonable proof” supporting representations of benefits and performance for products and services, it is necessary to fulfill the following 2 requirements.

1. Submitted documents (submitted documents based on Article 7 (2) of the Premiums Representations Act. Hereinafter the same) should have objectively proven details (it should fall under either of the following)
 - Results obtained through testing or investigations
 - Opinions or academic documents of experts, expert associations or professional institutions

¹² Asami Takehama (2001) (Advertisement display for environmentally friendly products and ISO14021: “Requirements applied to all the self-declared environmental claims”) prepared referring to collection of essays on industry and society, Ritsumeikan University

2. Represented benefits and performance should appropriately correspond with proven details in the submitted documents

The concrete concept for these 2 requirements is described in detail in the operational guidelines of Article 7 (2) of the Act against Unjustifiable Premiums and Misleading Representations.

https://www.caa.go.jp/policies/policy/representation/fair_labeling/guideline/pdf/100121premiums_34.pdf

- c) It should be valid for applicable products and should be used only under appropriate circumstances or conditions

For the point that claims should be used under appropriate circumstances, for example, it may not be appropriate to indicate that an air duster does not contain CFC. CFC usage is currently prohibited for all consumable goods, however, for consumers who do not know it, these claims may have a risk of giving such impression that such a product has exceptional environmental considerations. In case of claiming that a product does not contain a substance prohibited to be used by law, it is necessary to indicate, in parallel, that such a substance is prohibited to be used, not to lead to any misunderstanding, considering legal knowledge of consumers.

- d) It should be clearly stated whether claims are for the entire product, or only for certain parts or packaging of a product, or for service elements.

As an example of indicating which part of a product a representation is referred to, finished product or certain parts, such a representation as “please bring used ink cartridge for printer to retail shops having a collection partner shop mark or XX service center. Thank you for your cooperation for environmental preservation” can be an accurate one, as it limits the recycling object to cartridges, not the product itself. It is inappropriate if the environmental burden reduction effects for the entire product are unknown even though a certain part of product’s material has such effects. The Japan Fair Trade Commission states that it is necessary to clearly indicate whether the details of advertising representations on environmental preservation effects are for a certain part of a products such as packaging or for the entire product without giving any misunderstanding to general consumers.

- h) It should consider all related aspects in the lifecycle of a product so that consumers can recognize when reducing an environmental impact, there is a possibility to increase another environmental impact while it is true for the final product.

Remarks: It does not necessarily mean that a lifecycle assessment is required. Explanations for this Clause are stated in 5 basic items ③ of Page 22.

- i) If a product is not guaranteed or proved by independent third-party institutions, such a representation as implying it is as such should not be made.

As logotypes to indicate certification or recommendation by third-party institutions, there is, for example, Eco Mark certified by the Japan Environment Association which has a pictorial image of the Earth, and there are similar images as design in some businesses' own environmental labelling. To prevent consumers from confusing some businesses' own labelling, etc. with environmental labelling, etc. certified or recommended by third-party institutions or from misunderstanding them, it is desirable to add information on representation party of such labelling, etc. (name of businesses, name of associations) to businesses' own labelling, etc.

- j) Whether explicitly or implicitly, non-existing environmental improvement should not be indicated. Also, the environmental aspects of a product relating to claims should not be exaggerated.

As example of indicating non-existing environmental improvement, there is a case where a shampoo's container bottle indicates that "reducing plastics waste and contributing to the environment" with a mark indicating it is possible to make it small by crushing it, however, as the environmental effects made by crushing a container is extremely minor, viewing from its lifecycle environmental effects, it may be regarded as exaggeration of environmental effects.

- k) Though a claim is true in its expression, if it may cause a misunderstanding to purchasers or it is likely to cause a misunderstanding by omitting related facts, such a claim should not be made.



As example of indication leading to misunderstanding by omitting related facts, for example, there may be often an issue, for such a product where a certain part of the product has environmental burden reduction effects while another part of the product has environmental burden, when claiming its environmental burden reduction effects without sufficiently explaining the environmental burden brought by another part of the product. For example, such an advertisement that a vehicle's radiator coated with special catalyst makes harmful ozone harmless does not offset the impact of air pollution through NO_x, etc. with a vehicle's exhaust gas or the impact of CO₂ emissions, namely, it does not explain the overall effects of a vehicle, therefore, it may be regarded as inappropriate.

- n) In case of claiming a comparison in superiority or improvement in environmental aspects, it should be concrete and clearly explain the proof of such a comparison. In particular, environmental claims should be appropriate from such a viewpoint of how much improvement has been made recently.

For comparison claims, it is necessary to be clear on whether it is a comparison with own company's products, or with other companies' products, or with the industry average. In addition, it is necessary for products used for comparison to be, in principle, ones in the equivalent class and also necessary to clearly indicate product name and model name of the product used for comparison. For electronics products, in case a product is compared with the one manufactured a long time ago, it is an issue if there is any reasonable reason to compare with such an old product.

- p) A claim should not be made using the fact that there is no certain ingredient or property in a product as proof, though such ingredient or property is never contained in such category of products.

For substances principally not contained in a product, if there is such an indication as “not containing XX”, it might as well claim a benefit for something principally irrelevant. As there is a possibility of giving such an impression that such a product is extremely superior product, it is an inappropriate indication.

 Reference 

Mass balance approach

The mass balance approach is one of the management models for processing and distribution processes (Chain of Custody¹³) inspecting processing and distribution supply chains from materials to products. When a material having a certain property (example: recycled material) is mixed with other materials (example: petroleum-based material) in processing and distribution processes from materials to products, mass balance approach is a method to allocate such a property to a certain part of a product according to the input volume of materials having such a property. As it is difficult to understand environmental value at a glance, compared to actual usage, in case of indicating recycled material or bioplastics, etc. using mass balance approach, it is necessary to make appropriate indication and communication according to product characteristics (reference: the Ministry of the Environment, “Basic concept on utilization of mass balance approach for plastic resources circulation” (September 2024). It is expected to utilize these Guidelines including 5 basic items.

The concept of mass balance approach is being applied to various raw materials, and it is necessary to check for each raw material, discussions are under way for its treatment.

Reference: the Ministry of the Environment, “Basic concept on utilization of mass balance approach for plastic resources circulation” (September 2024)

<https://www.env.go.jp/content/000254454.pdf>

③ To consider all related aspects of product lifecycle

Among specific requirements (5.7) of ISO/JIS Q 14021, we explain explanations and examples for h) as follows.

- h) It should consider all related aspects in the lifecycle of a product so that consumers can recognize when reducing an environmental impact, there is a possibility to increase another environmental impact while it is true for the final product.

Remarks: It does not necessarily mean that a lifecycle assessment is required.

¹³ Mass balance approach is defined in ISO22095 standards, standards on Chain of Custody.

In case an environmental claim has a substantial impact on lifecycle of products and services, not only being applied to final products, then, it is desirable to make evaluation comprehensively and quantitatively and it should be an indication judging the extent of improvement and superiority in environmental burden. In this case, during the process to reduce a certain environmental impact, there is a possibility to increase another environmental impact (trade-off¹⁴), therefore, it is desirable to ensure there is no trade-off in the entire lifecycle and it is inappropriate to make claims by exaggerating that fact that the environmental burden is reduced at a specific stage of the lifecycle.

More concretely, it is desirable to consider product lifecycle from the following viewpoints.

- ✓ To check trade-off considering all environmental aspects and environmental impacts:
It is necessary to evaluate environmental performance considering such all the stages as “from the cradle to the grave”, from collection of resources to manufacturing, usage, disposal and recycling.
We need to review if claimable environmental improvement would not bring substantial trade-off at another stage of product lifecycle or environmental aspect. For example, there may be such cases where only such a fact that the composition rate for recycled materials is emphasized and the usage volume of raw materials has increased due to such a reason, compared to the previous volume, or where though CFP is small, it gives a substantial impact on biodiversity. In case a trade-off is identified, it is required to indicate such a fact as well without covering it up or to make mitigation measures.

- ✓ To claim critical environmental performance from the viewpoint of product lifecycle:
It is necessary to ensure there is no such case where a negative impact from claimable environmental performance is greater than the performance improvement. For example, only the fact that the composition rate for recycled materials is high is emphasized, and the fact that harmful chemical substances giving a substantial impact to human health and the environment is covered up.
In addition, if a claim is based on specific part of a products (parts, etc.), it is necessary to clearly state to which part of the product such a claim is referred, however, it is not appropriate to make environmental claims for the entire part of the product or the business even if such a claim is related to environmental burden improvement or superiority in very minor part of the product in terms of weight or area compared to the product itself. For example, it may be a case of claiming by exaggerating the usage of recycled parts which is less than 1% of the product weight.

¹⁴ A relationship in which A is superior to B in a certain aspect, however, in another aspect, B is superior to A. For example, a trade-off between different environmental burden items such as having less nitrogen oxides emissions, air pollution substance, compared to a substance to be compared, however, having more CO₂ emissions, causative substance for global warming.

In case a representation is made on the final product for the fact that environmental burden is reduced at a specific stage of the lifecycle (example: in case only such intermediate products as threads or fabrics for clothing are certified), it is necessary to clarify the scope of the claim not to give consumers such misunderstanding that the entire lifecycle has consideration to the environment.

- ④ It is possible to provide necessary data for verification of environmental claims and accessible to such information

In ISO/JIS Q 14021 standards (6), requirements for evaluation and verification are defined. It is stated that claim details are to be proved and evaluation method for its verification are to be prepared before preparing such claims, and that the evaluation is to be completely documented and such documents are to be subject to information disclosure.

In 6.1, it is stated that claimers are required to be responsible for evaluation and provision of data necessary for self-declared environmental claims. In addition, for the reliability of evaluation method, it is required to prepare evaluation method before making claims, and to secure a reasonable period for documentation of evaluation and information disclosure.

Also, in ISO/JIS Q 14021 standards (6.5), it is stipulated that claims are to be verifiable without requiring companies' confidential information, and relevant information is to be disclosed upon requests of those who seek verification of the claims, for ensuring evaluation and verification. They also define minimum information required to be retained.

In addition, it is important to ensure that consumers can easily access detailed information using 2D codes, etc.

It is sufficient, in principle, to ensure verification through voluntary initiative method unless otherwise stipulated, however, it is also possible to use third-party certification system (Eco Mark operated by the Japan Environment Association, etc.) setting such criteria equivalent or more than the level of the claim (example: recycled paper pulp mixing rate, 70%) or verification by external institutions, considering validity of such cost-benefit.

[Recommendations]

Information disclosure on environmental representations

Among businesses, etc. having environmental representations, there are such cases disclosing data used as proof for environmental representations, indicating that they ensure environmental representations conforming to ISO/JIS Q 14021 standards as well as voluntarily disclosing such criteria, etc.

Businesses, etc. are required to fulfill their accountability and to ensure reliability and transparency of information for various stakeholders such as consumers.

In addition, it is desirable to disclose concrete details of voluntary standards and data used as proof and to explain them understandably to general consumers in detail.

- ⑤ Comparative claims for products or processes should be appropriately made with LCA evaluation and values, etc.

In making comparative claims, it is stated that such a comparison is to be made against comparable products having similar functions provided by the same or other manufacturers available in the same market currently or recently, using publicly disclosed standards or approved testing methods. In addition, for standards or testing methods used for comparison, ISO/JIS Q 14021 standards (6.4) define their priority.

A. Evaluation of products or processes

In ISO/JIS Q 14021 standards (6.3.1), it is stated that comparative claims should be an evaluation against products that are own company's previous processes and products or other company's processes and products.

B. Comparative claims through environmental aspects of product lifecycle

In ISO/JIS Q 14021 standards (6.3.2), comparative claims on environmental aspects for product lifecycle should be calculated with the same measuring unit, with the same functional unit and for an appropriate period of time.

C. Comparative claims with values, etc.

In ISO/JIS Q 14021 standards (JIS Q 14021 6.3.3.), comparative claims with values should be made using percentage or absolute values. In addition, it is necessary to make separate claims for improvement in products and improvement in packaging respectively.

D. Priority in evaluation and verification methods for claims

In ISO/JIS Q 14021 standards (6.4), it is stated that the priority in evaluation and verification methods for claims should be (1) international standards, (2) standards easier to accept and approved internationally (including regional and national standards) and (3) methods in industries made peer review or commercial methods

(4) Requirements for Logotype Utilization

In case of using logotypes to communicate information on businesses' approach to environmental considerations and to indicate that products and services pass voluntary standards, in ISO/JIS Q 14021 standards, usage methods are stipulated while the usage of logotypes is optional.

In this case, it is necessary to make it clear whether such logotypes represent the approach to environmental considerations by businesses, etc. or they refer only to products and services conforming to the criteria independently set by businesses, etc.

Among the above-mentioned, we explain 5.8.4 and 5.8.5 as follows.

5.8.4 The logotype used to declare implementation of Environmental Management System should not be used in such a manner that it may be misunderstood with the logotype indicating environmental aspects of a product.

In case a certain logotype is used to indicate businesses' overall initiatives such as implementation of Environmental Management System, not directly relating to products and services, it is necessary to clearly define what such a logotype means and to use it in such a manner not to be misunderstood.

5.8.5 Natural objects can be used as logotype only when they have direct and verifiable relationship with claimed benefits.

The design using such natural objects as flora and fauna or the Earth as logotype is highly likely to confuse consumers, as it is difficult to distinguish it from environmental representations, in particular, environmental labelling. It is necessary to avoid any design indicating natural objects, on product itself or packaging, etc., that may cause consumers a misunderstanding with environmental representations, following the provisions in ISO/JIS Q 14021 standards (5.9.2). In addition, for trademarks using the design of natural objects, it is likely to be difficult for consumers to distinguish them from environmental representations. Apart from such cases that such designs are already well recognized as trademarks, not as environmental representations, having no risk of being misunderstood, or that the reason to use the design of natural objects is clearly indicated, it is necessary to be careful not to cause consumers a misunderstanding with environmental representations, by indicating that such a design is a trademark, etc.

[Recommendations]

In case a logotype that can be used when fulfilling criteria and usage conditions, etc. set by private associations and NPO, etc. is indicated, it is necessary to indicate explanations (meaning and usage criteria, etc. for such a logotype) near the logotype or in such a place that can be easily recognized by consumers, or to make explanations traceable.

In case of using logotypes, it is desirable to indicate explanations (meaning and usage criteria, etc.) near such logotypes or in such a place that can be easily recognized by consumers¹⁵, or to make the details of explanations easily traceable at website, etc.

In addition, in case indicating logotypes in such indirect media as catalogs or websites, they can be indicated independently, however, it is desirable to indicate their explanations at appropriate places or in appropriate details so that consumers can easily recognize them.

Also, in case of stating environmental burden reduction effects for each product and service on its company's website, it is likely that it may be easily understood by appropriately adding remarks and explanations to technical terms unfamiliar with consumers.

In case of introducing the website, it is effective as information provision method for consumers to create a site accessible from smartphones, etc. using 2D codes, in addition to indicating URL.

(Representation example)



100% recycled paper pulp is used

This product uses 100% recycled paper pulp. We voluntarily indicate this mark in line with the representation method determined by 3R and Resource Circulation Promotion Forum.


¹⁵ For example, there can be such a method that the certification mark is indicated on product itself, and its explanation is indicated on the product packaging.

●●● Reference ●●●


Recycling mark for small rechargeable battery

By “the Act on the Promotion of Effective Utilization of Resources” enforced in April 2001, collection and recycling of such small rechargeable batteries as nickel-metal hydride battery (Ni-MH), lithium-ion battery (Li-ion) and small control valve type lead-acid battery (Pb) were made mandatory, and indication of recycling mark was made mandatory for them in the same manner as nickel-cadmium battery (Ni-Cd), for which identification mark had already been made mandatory.


The three arrow mark by battery type is used as its mark, which is indicated on rechargeable battery itself and on the recycling box at shopfront.




Ni-Cd
nickel-cadmium
battery



Ni-MH
nickel-metal
hydride battery



Li-ion
lithium-ion
battery



Pb
small control
valve type lead-
acid battery

(website of Battery Association of Japan <https://www.baj.or.jp/index.html>
 website of Japan Portable Rechargeable Battery Recycling Center
https://www.jbrc.com/general/recycle_flow/)

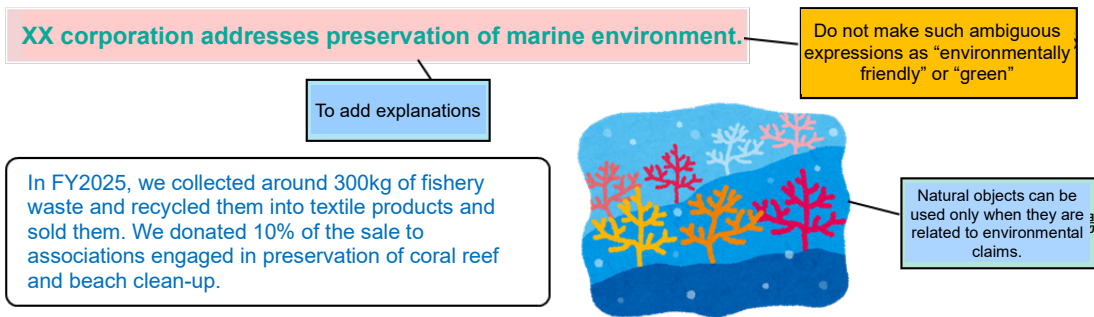
(5) Requirements for Corporate Stance, Image Advertisement and Stock Name, etc.

These Guidelines cover environmental representations not directly relating to businesses' transactions of products and services in their scope. Therefore, for environmental representations for corporate stance, image advertisement, stock name or brand name (product name and series name, company name) not directly relating to products, etc., it is required to ensure environmental representations in line with the following requirements based on ISO/JIS Q 14021 standards.

- ① To fulfill all the requirements for 5.2 - 5.6 of JIS Q 14021
- ② In case such environmental representations fall under JIS Q 14021 5.8 (usage of logotype when making environmental claims), 5.9 (other information or claims) and 5.10 (specific logotypes), they should fulfill all applicable requirements.

In case of using environmental representations for stock name and brand name, it is required to avoid using such stock name or brand name independently and to add supplementary explanations to specify they are effective to what kind of environmental aspects.

[Example of corporate stance, image advertisement]



(6) Requirements in case Businesses, etc. use Logotypes operated by Private Associations and NPO, etc., not subject to Certification System, under Self-Declarations

In case businesses, etc. use logotypes, etc. operated by private associations and NPO, etc., not subject to certification system under self-declarations, it is also required to fulfill applicable requirements in ISO/JIS Q 14021 standards (in particular, ISO/JIS Q 14021 6.1 - 6.5). In addition, for the criteria to use logotypes, etc. and the rules for representation methods, etc., operating private associations and NPO shall determine them, however, the conformity evaluation to applicable criteria should be made under the responsibility of businesses, etc. under their self-declaration of conformity.

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