



THE ECO WELL

Sustainable  
Beauty  
E-Summit

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 **Bluebird**

[bluebirdclimate.com](http://bluebirdclimate.com)

# Substantiating Sustainability

*How to walk the talk with product-level sustainability*

Sustainability is now **tablestakes**

2.8x

growth for  
sustainability-marketed  
products vs. conventional

# Sustainability is key to growth and loyalty

In 2021, 48% of new products now  
incorporate and market sustainability,  
up from 36% in 2020

69%

of consumers say sustainability would make them **most likely** to shop with a brand again

# Sustainability is key to growth and loyalty

For beauty, **sustainable packaging** is now more important than discounts and free samples to brand loyalty

But **88%** of Gen Z consumers  
don't trust brands' sustainability  
claims

refillable

compostable

glass

biodegradable

sugarcane plastic

Beauty brands have been leaning on

**attributes**

plastic neutral

PCR

plastic-free

carbon neutral

ocean-bound plastic

no air shipping

recyclable

aluminum

zero waste

mail-back program

The EU and UK are cracking down on greenwashing through regulation



## Half of green claims used to sell products in EU are misleading, Brussels finds

European Commission is preparing to introduce rules to prevent greenwashing

**Alice Hancock** in Brussels and **Camilla Hodgson** in London JANUARY 12 2023

# The EU and UK are cracking down on greenwashing through regulation



Press release

## **CMA to scrutinise ‘green’ claims in sales of household essentials**

The CMA will examine the accuracy of ‘green’ claims made about household essentials – such as food, drink, and **toiletries** – to make sure shoppers are not being misled.

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From: [Competition and Markets Authority](#)

Published 26 January 2023

Beauty & personal care are included in the definition of toiletries



But it's not just Europe...  
the US is quickly following suit



## FTC Seeks Public Comment on Potential Updates to its 'Green Guides' for the Use of Environmental Marketing Claims

December 14, 2022



Public comments are being accepted until  
February 21, 2023 at [FTC.gov](https://www.ftc.gov)

Lack of trust from consumers  
and increased regulation means  
brands need **substantiation**

# Without it, brands are getting cancelled...

**TikTok**  
@acteevism

miss kimmy k, this is not refillable

1.1M 3159

<https://www.tiktok.com/@acteevism/video/710922202062...> Copy link

**168,023 views**  
skkn Don't run on empty. R with a sustainable ritual.

**@acteevism**  
Megan McSherry - eco fashion - 2022-6-14  
@SKKN BY KIM i am available for consulting to make your packaging actually refillable (or at least revise your claims so you aren't greenwashing) 🙄 #greenwashing #skkn #greenscreenvideo  
🎵 BoJack's Theme - Patrick Carney

**Nikki**  
Literally who approved this 🙄 this is the same as a decorative tissue box holding the actual tissue box inside of it ??  
2022-6-14 Reply  
View more replies (36)

**zen** ☆  
I've never wanted to get kressed so bad  
2022-6-14 Reply  
View more replies (147)

**lex**  
This is the definition of greenwashing lmao  
2022-6-14 Reply

# Getting publicly sued or fined for violations...

## Greenwashing Check: Is Allbirds As Sustainable As It Claims To Be?

by Megan Doyle | Nov 1, 2021 | 0 Comments

SHARE    

## H&M Case Shows How Greenwashing Breaks Brand Promise

Matthew Stern Contributor  
RetailWire Contributor Group 

Jul 13, 2022, 12:03pm EDT

## NEXT UP FOR THE GREAT GREENWASHING CRACKDOWN: "CLEAN" BEAUTY

19 DAYS AGO IN BEAUTY  
WORDS BY ALEXANDRA PAULY

It's official: The Great Greenwashing Crackdown is coming for beauty. Mega-retailer Sephora is facing a class-action lawsuit for allegedly engaging in false advertising via its collection of "clean" beauty products.

# And leaving a terrible impact on the environment

Fast-moving consumer goods (including beauty) are one of the **Top 8 highest emitting** supply chains globally, which account for 50% of total emissions

# And leaving a terrible impact on the environment

## Greenhouse gloss

Is the beauty industry's commitment to tackling climate change more than skin deep?



## Clean beauty

'Clean beauty' is a subjective term, loosely used to describe products produced with safe, natural, organic or eco-friendly credentials. The demand for 'clean' products is expected to rise significantly, with the global market expected to be worth US\$22 billion next year, according to Statista. There have been calls to regulate the use of terms such as clean and sustainable within the beauty industry, but at present there are no standards products must meet in order to be marketed this way.



**The sector showed limited recognition and ownership of its direct role in causing, and responding to, climate change**

# And leaving a terrible impact on the environment

**VOGUE**  
BUSINESS

MEMBERSHIP SIGN IN

TECHNOLOGY SUSTAINABILITY COMPANIES FASHION RETAIL BEAUTY DATA

SUSTAINABILITY

## Is beauty overlooking its biggest sustainability challenge?

Beauty's top players should place more emphasis on raw material sourcing and consumer use to reduce emissions, a report by the Carbon Trust's Net Zero Intelligence Unit argues. Brands say they're making strides against industry-recognised targets.

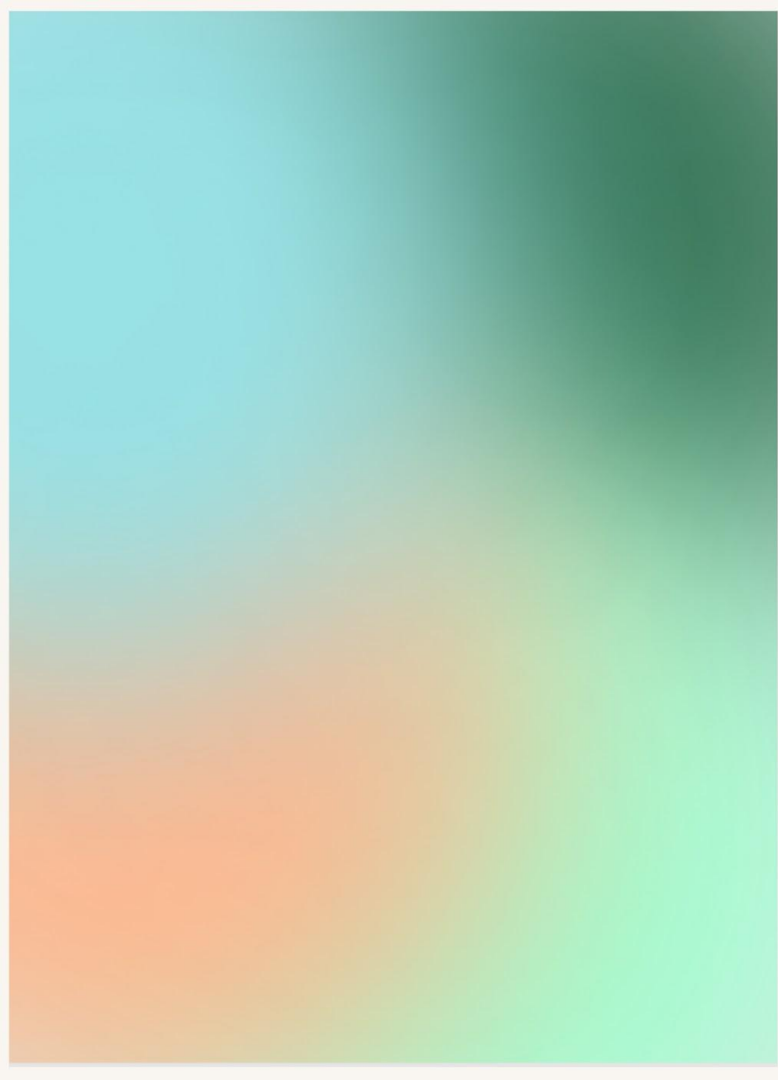
BY MALIHA SHOAB  
January 25, 2023

[f](#) [t](#) [p](#) [in](#)

The beauty and wellness industry needs to show their homework and use science-based tools to truly tackle climate change.”

Lindsay Dahl,  
Chief Impact Officer

**Ritual**



# Measurement is the key to substantiation

Regulators specifically require  
**Life Cycle Assessments (LCAs)**  
to make claims on environmental  
impact for product



# Definitions

## **Life Cycle Assessment (LCA)**

a way to measure environmental impact of a product from all stages of its lifecycle, can include many different impact categories

## **Product Carbon Footprint**

A product's LCA focused specifically on its climate impact through measurement of greenhouse gas emissions

# LCAs need to include the holistic impact of a product and document their assumptions in calculations

**Ingredients** need to be sourced, processed, and transported to a manufacturer

The product needs to be made by processing ingredients into the **formula** and filling it into packaging



**Packaging** materials need to be sourced, each component manufactured, transported to where the formula is filled

**Shipping and distribution to retailers & customers** via land, air, and sea, **consumer use**, and **disposal / end of life**

# Where do the carbon emissions\* come from?



direct emissions from factories



emissions from transportation fuel



emissions from electricity

CO<sub>2</sub>e

*\* A note for the nerds:*

The emissions that are typically measured are not just carbon dioxide, but also other greenhouse gases including methane and nitrous oxide. Together, these make up CO<sub>2</sub>e, or CO<sub>2</sub>-equivalent, which you might see in impact reports or claims

# What goes into making a beauty product?

**Ingredients** need to be sourced, processed, and transported to a manufacturer



The product needs to be made by processing ingredients into the **formula** and filling it into packaging



**Packaging** materials need to be sourced, each component manufactured, transported to where the formula is filled



**Shipping and distribution to retailers & customers** via land, air, and sea, **consumer use**, and **disposal / end of life**



This means brands would look at **all aspects** of a product to understand its overall impact, not a single attribute

# So why are brands not doing this already?



Historically, a single product's measurement can be thousands of dollars



Assessments have taken up to 6-9 months to complete, and brands are tight on time



Lack of access to the information needed, and in-house expertise

However, lifecycle  
assessments are the best way  
**to substantiate sustainability**

Technology is making it easier  
to make **informed** decisions  
and communicate them



# Best practices for substantiating sustainability:

1

Design products holistically from the start of product development using data

2

Measure how your products are doing, evaluate how to reduce, and take action over time

3

Communicate impact using data, and share results & assumptions transparently



1

# **Design** products holistically from the start of product development using data

Move beyond single attributes like plastic-free. For example, consider not only *which* materials you are using, but also *where* they are going – transportation emissions can be a huge driver of total emissions



2

## **Measure** how your products are doing, evaluate how to reduce, and take action over time

Conduct lifecycle assessments on a regular basis, and use it to evaluate decisions *before* changes are made

Commit to company-level reductions by evaluating impact for each product



3

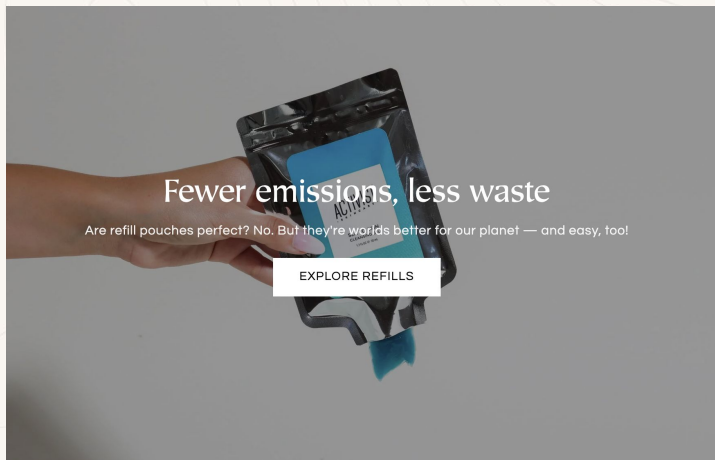
## **Communicate** product impact using data, and share results & assumptions transparently

Rely on data over attributes for claims

Make substantiation easily accessible

Clearly state assumptions & methodology

# Case study: Activist Skincare



3

1

### Frequently asked questions about refills

Why are refill pouches eco-friendly? ▾

How do refill pouches reduce carbon dioxide (CO2) emissions? ▲

Pouches greatly reduce carbon dioxide emissions compared to recycled glass containers.

Our average glass container weighs 100g and is manufactured overseas. It will travel ~17,000 miles *per cycle* of recycling and remanufacturing. That's a huge carbon footprint.

A pouch weighs an average of 8g and only travels 8,300 miles thanks to US-based manufacturing.

That means that glass containers generate 115 times the shipping emissions that a pouch does, which doesn't even take into account the huge amount of energy it takes to recycle and re-manufacture glass when it's treated as a single-use container.

If you refill your glass container 10 times, you'll produce >1,000% less greenhouse gas emissions!

2

**activistskincare** Fill 'er up! Glass is an awesome eco friendly option for packaging; it's durable, beautiful and recyclable. But in cutting down on waste, our first best option is to reuse what we already have. Instead of continually producing more glass bottles which are shipped from overseas and weigh a lot, we can refill those using lightweight, locally sourced plastic pouches.

These plastic pouches weigh next to nothing (± 5g) and require no additional packaging to keep them protected while shipping. When you add all of this up, they create 115x less shipping emissions than glass.

# Case study: Cocokind

cocokind

shop all ▾ best sellers



1

## sustainability

carbon emissions (co2e) per use

**10.3g**

70 uses per tube | 1 use = 1/4 teaspoon / 1.2 ml

3

pre manufacturing	8.1g
production	0.3g
distribution	1.8g
end of life	0.1g

how this relates to daily life

☘ coffee to go  
600g / 8oz

☘ cotton tshirt  
4340g / shirt

☘ commuting alone  
404g / mile

☘ water bottle  
358g / bottle

cocokind

### what people think impacts a product's carbon footprint



cocokind

### what actually impacts a product's carbon footprint



cocokind

cocokind.com/blogs/news/measuring-our-carbon-footprint

**Phase 3:** Creating annual tangible action steps for reduction that are communicated publicly.

**We are currently in Phase 1**

While we already implement many sustainability practices we are proud of, one of the largest challenges is simply measuring our current impact. We cannot say that we are carbon neutral until we have a deep understanding of what our current impact is. This work is what we are calling "Phase 1", which includes researching and measuring our emissions at the product and company level.

In Phase 1, we are conducting carbon accounting and product life cycle assessments of each of our products with a third party audit firm. Below, we spell out this process!

**Our process of evaluating a product's carbon footprint**

A product's carbon footprint is the total greenhouse gas emissions produced or used throughout its full life cycle, from pre-production through end-of-life.

We are currently undergoing an audit of our footprint for each product with a third party research firm. This work includes:

- Life Cycle Assessment: this measures emissions from the stages of a product's life cycle that we mentioned above:
- Pre-manufacturing: production of raw materials, components, and any pre-processing, transportation of ingredients and components to the manufacturer
- Production: production and assembly of the final product, including any waste from production
- Distribution: freight and materials used to transport the product to distribution hubs and/or retail sites

2

required to recycle, reuse and/or dispose of a emissions associated with final product

# Case study: Reformation

## Reformation

New Clothing Dresses Tops Jeans Sweaters Wedding



### Sustainability impact

☁ 612 lbs. of carbon dioxide savings

💧 2,963 gal. of water savings

Sustainably made in China

Size



Proc

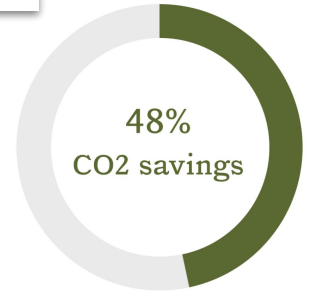
Sus

☁ 6

💧 2

Sus

2



48%  
CO2 savings

Carbon dioxide (Metric tons)

Ref footprint: 24,871

Conventional footprint: 47,658

Savings: 22,787

## What is RefScale?

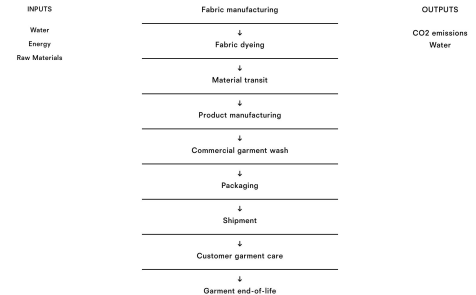
RefScale tracks the carbon and water footprint of our stuff.

We calculate how the impact of producing Ref products compares with most clothes bought in the United States. We share RefScale results for each product we make on our website and publish the totals in our Sustainability Report.

RefScale takes into consideration impacts from most processes in the product's life cycle. We publish our [methodology](#), so you can really dig in and understand what we include in the calculations.

3

### Product life cycle



# Case study: Experiment Beauty



## SUSTAINABILITY

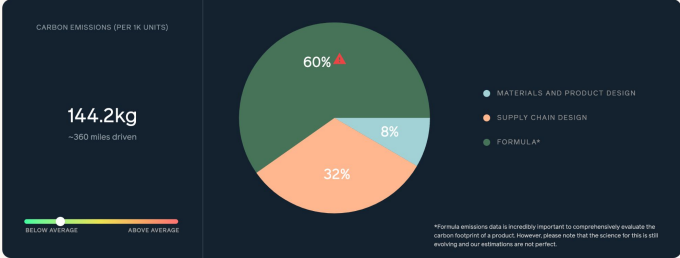
Every purchase of Super Saturated generates 58% less waste and 23% less carbon compared to typical serums on the market.

*How we achieved this:*

- 40% recycled plastic content in our packaging- we'll avoid using the equivalent of 321,000 plastic straws in virgin plastic this year.
- By offering a refill (no pump version), we've decreased this product's waste by 32%\* and emissions by 29%\*
- The lightweight product design avoids up to 58% of waste and 23% of emissions compared to a typical serum.



Carbon emissions ⓘ



Sustainability report Powered by Bluebird v1.2

Carbon impact ⓘ

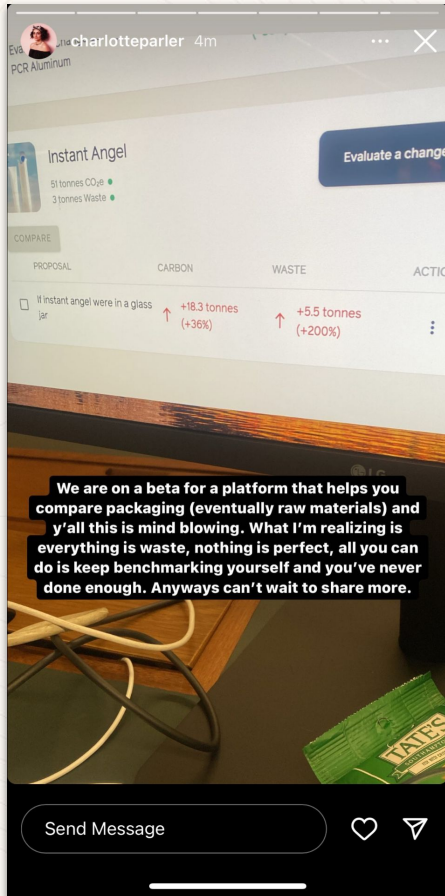
BELOW AVERAGE | ABOVE AVERAGE

Waste impact ⓘ

BELOW AVERAGE | ABOVE AVERAGE

See the full transparency report →





**We are on a beta for a platform that helps you compare packaging (eventually raw materials) and y'all this is mind blowing. What I'm realizing is everything is waste, nothing is perfect, all you can do is keep benchmarking yourself and you've never done enough. Anyways can't wait to share more.**

# Live Demo

# Takeaways

1

Design holistically

2

Measure

3

Communicate with data

How do you know if a brand is “sustainable”?

Have them show you, not tell you

**sustainability facts**

carbon e	
per use 200	
pre mar	
product	
distribu	
end	
pl	
	100%
	arizona
	glass
	0%
	ic
	%

constancebrowne  
how do i know if a brand is actually sustainable, not just marketing?

HAVE THEM SHOW YOU NOT TELL YOU.

**sophfei and cocokind**  
#DearSophia Pt.2

sophfei welcome back to #DearSophia where @cocokind sustainability advisor @sophfei answers all your questions (no Q is dumb or too big/small to answer)

today we're diving into the age old question of how to tell if a brand is actually sustainable?

measurements speak louder than words, actions speak louder than words. for example: every @cocokind product includes a 'sustainability facts' label like a nutritional label breaking down emissions, production and how to properly recycle that said product

what other #DearSophia Qs do you have?

#sustainability #sustainableliving #climatizacion #beauty  
13w

twinscott This video 🥰🥰🥰🥰  
13w 2 likes Reply  
View replies (2)

peopleheartplanet Perfectly put 🙌🙌 Despite all this education, people still find it difficult to decide which brands are truly sustainable and which ones are just green washing!! We don't believe that certifications are the only factor as smaller ethical brands may not have the time and resources to gain certifications. So I totally agree that looking at their impact and sustainability reports, reading

569 likes  
OCTOBER 24, 2022  
Add a comment... Post



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# Substantiating Sustainability

*How to walk the talk with product-level sustainability*

# Appendix

# The UK introduced greenwashing legislation in 2021

The UK Green Claims Code checklist:

- Are your claims truthful and accurate?
- Are your claims clear and unambiguous?
- Do your claims omit or hide important information?
- Do they only make fair and meaningful comparisons?
- Have you substantiated your claims?
- Do they consider the full lifecycle of the product (from creation to disposal)?



These guidelines are best practice

# The US has its own set of greenwashing guidelines

The FTC Green Guides were last updated in 2012, but are being reviewed this year

They're expecting to specifically review guidelines for making marketing claims on the following, among others:

- Carbon offsets & climate change
- The term “Recyclable”
- The term “Recycled content”
- Terms like “compostable,” “degradable,” and “sustainable”

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# Product Carbon Footprint

