NAJ Guidance Note

ENVIRONMENTAL CLAIMS

Version 2. November 2025.



Introduction

The aim of this Guidance Note is to help members understand and comply with their responsibilities under consumer protection law regarding environmental assertions. This guidance aligns with the Competition and Markets Authority's (CMA) Green Claims Code. Furthermore, its contents are consistent with the Advertising Standards Authority (ASA)'s guidelines on green claims, The Responsible Jewellery Council (RJC)'s Code of Practice, the International Organisation for Standardisation (ISO)'s Jewellery and Precious Metals Standard and The World Jewellery Confederation (CIBJO)'s Blue Books.

While this guidance focuses on environmental claims, it is important to recognize that claims concerning responsible sourcing, social and ethical impacts should also be held to the same standard. *Responsible Sourcing* is the focus of a separate NAJ Guidance Note.

The National Association of Jewellers

Shaping professional excellence in jewellery businesses and their people

NAJ Guidance Note: Environmental Claims

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Summary

Consumers are increasingly demanding products and services which minimise harm to or have a positive effect on the environment. As a result, there has been a proliferation of products, services and businesses which claim to meet that demand.

Some environmental claims are unreliable, and consumers trust in them is extremely low. Consumers can be misled, and companies can give a false impression of their environmental impacts or benefits - a practice known as greenwashing.

By following the guidance set out in this document members will ensure that any environmental claims they make are clear and not misleading to their consumers.

Principles

This CoP sets out six principles specifying that environmental claims,

Must:

1. Be truthful and accurate.
2. Be clear and unambiguous.
3. Be fair and meaningful.
4. Consider the full life cycle of the product or service.
5. Be substantiated.

Must NOT;

6. Omit or hide important relevant information.

What are environmental claims, and when are they misleading?

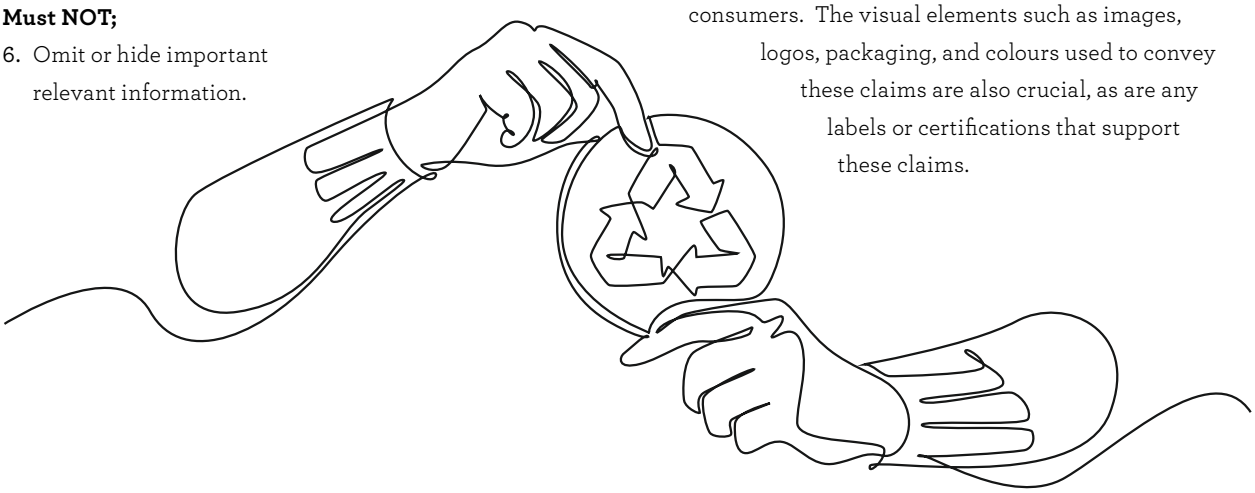
Environmental claims are statements that suggest a product, service, or business is better for the environment. They can imply that a product has a positive impact on the environment, causes less harm than previous versions or competitors, or has no environmental impact at all.

To be genuine, these claims must accurately reflect the true environmental impact without hiding important information. Misleading claims happen when businesses exaggerate the environmental benefits of their products, services, or operations, or when they omit crucial details.

Environmental claims should be based on objective facts and scientific evidence, and businesses must be able to provide evidence to support these claims.

Claims must be truthful and accurate

Businesses must ensure that the environmental claims they make about their products, services, brands, and activities are accurate and truthful. Claims should not mislead by stating incorrect information or exaggerating the sustainability or environmental benefits. Terms like 'green', 'sustainable', or 'eco-friendly' should be used carefully and backed by evidence to avoid misleading consumers. The visual elements such as images, logos, packaging, and colours used to convey these claims are also crucial, as are any labels or certifications that support these claims.



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Green claims checklist

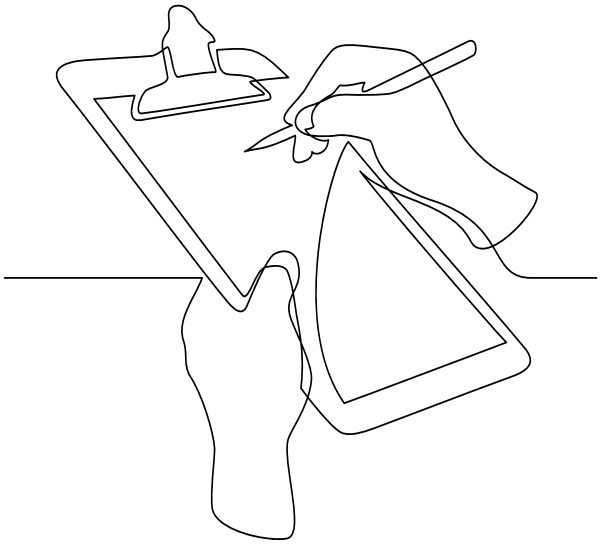
When making a green claim, a business should be able to answer 'yes' or agree to each of the following statements:

1. The claim is accurate and clear for all to understand.
2. There's up-to-date, credible evidence to show that the green claim is true.
3. The claim clearly tells the whole story of a product or service; or relates to one part of the product or service without misleading people about the other parts or the overall impact on the environment.
4. The claim doesn't contain partially correct or incorrect aspects or conditions that apply.
5. Where general claims (eco-friendly, green or sustainable for example) are being made, the claim reflects the whole life cycle of the brand, product, business or service and is justified by the evidence.
6. If conditions (or caveats) apply to the claim, they're clearly set out and can be understood by all.
7. The claim won't mislead customers or other suppliers.
8. The claim doesn't exaggerate its positive environmental impact, or contain anything untrue – whether clearly stated or implied
9. Durability or disposability information is clearly explained and labelled.
10. The claim doesn't miss out or hide information about the environmental impact that people need to make informed choices.
11. Information that really can't fit into the claim can be easily accessed by customers in another way (QR code, website, etc. with clear signposting provided)
12. Features or benefits that are necessary standard features or legal requirements of that product or service type, aren't claimed as environmental benefits.
13. If a comparison is being used, the basis of it is fair and accurate, and is clear for all to understand.

Compliance

To ensure businesses follow consumer laws, environmental claims must be clear, accurate, and not misleading. The Digital Markets, Competition and Consumers Act 2024 (DMCCA) sets out rules preventing traders from using unfair commercial practices with consumers. Breaches can lead to significant penalties, including fines imposed directly by the Competition and Markets Authority (CMA). While the Business Protection from Misleading Marketing Regulations 2008 (BPRs) remain in force, the DMCCA is expected to gradually supersede them, particularly in areas relating to advertising and marketing between businesses.

While this Guidance Note aims to help members, it's not legal advice. Businesses are responsible for following the law themselves. The guidance covers important areas but doesn't include every possible situation. If members don't follow this guidance, they could face investigation or discipline from the National Association of Jewellers, and legal action from bodies like the Competition and Markets Authority (CMA), Trading Standards, or the Advertising Standards Authority (ASA). For more details please see; Trading Standards: powers, enforcement and penalties | Business Companion



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Frequently asked Questions

Q. Is using the term "Recycled Gold" misleading?

A. Gold rarely reaches an "end of life" stage in the traditional recycled sense. Unlike materials that degrade or become unusable, gold can be reused indefinitely without losing its properties. In the context of sustainability and environmental impact, the term "recycled gold" is used to denote gold that has been reprocessed from previously used items rather than newly mined.

In summary, while gold itself is not an "end-of-life" material, using the term "recycled" in this context is widely accepted and understood to mean gold that has been reclaimed and reused with the aim of contributing to a circular economy and resource conservation.

Terminology

- Alternative Terms: Terms like "repurposed", "recovered", "reprocessed", "re modelled" may be more appropriate to use and may help when in conversation with the customer.
- Only gold obtained with a purity equal or higher than 99.5% from eligible recycled gold sources can be called recycled gold.
- Terms like "recycled gold", "made of recycled gold", "recycled gold alloy", "x-carat recycled gold", can only be used for products containing no other type of gold than recycled gold.

Not Allowed:

Indicating a fraction of recycled gold (e.g. 80% recycled material).

To Avoid Greenwashing:

- **Be Transparent:** Clearly explain the sources and refining processes of the recycled gold.
- **Certify:** Use third-party certifications to verify recycled content.
- **Report Impacts:** Provide data on the environmental benefits.

It's misleading to claim that all recycled metal has a lower environmental impact. It's also incorrect to say that recycling metal reduces mining activity or waste.

Q. Can I make claims that synthetic diamonds are better for the environment?

A. Businesses should not call synthetic diamonds "environmentally friendly" or "eco-friendly" without proof of a positive environmental impact. Claims about the environmental or community benefits must be backed by reliable, independent sources. If these claims are made, evidence specific to the products and production methods should be provided. Claims of carbon neutrality must also be verified independently and specify if it is through carbon-neutral operations or by buying carbon credits. Furthermore, businesses should not describe synthetic diamonds as "ethical," "green," "responsible," "sustainable," or "social" without independent proof. If verified, this information should be mentioned on the company's website.

Guidelines can be found here Environmental, Social and Governance Principles for Laboratory-Grown Diamonds - CIBJO, provided by The World Jewellery Confederation and here; ISO 18323:2015(en), Jewellery — Consumer confidence in the diamond industry from International Organisation for standardisation (ISO).

Q. Can I make claims about carbon emissions?

A. When businesses say they're doing things like achieving "net zero" or "carbon neutrality," they need to explain clearly what they're actually doing. This is a tricky topic that most people might not understand right away, so they should use simple and accurate language.

Businesses should give accurate details about how they're actively cutting down on carbon emissions or how they're balancing out emissions by removing carbon from the environment.

If a business claims it's "offsetting" carbon emissions, they should share information about the program they're

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using. This program should follow recognized standards and measurements that can be checked and verified.

Q. Can I claim that my jewellery is "Ethical"?

A. The term "ethical" encompasses a broad range of moral considerations and can be subjective. While many companies use "ethical" to describe jewellery produced with responsible sourcing and fair labour practices, it's important to recognize that what is considered ethical can vary widely among individuals and cultures.

Producing/selling "Ethical" jewellery requires a holistic approach that includes responsible sourcing, fair labour practices, environmental stewardship, positive community impact, and transparent business practices. You must be able to prove that your jewellery is truly ethical beyond just sourcing

Alternative Terminology

To avoid the subjective nature and potential greenwashing implications of using the term "ethical," companies might consider using more specific terms:

- **Sustainably Sourced:** Emphasizes environmental and sourcing practices.
- **Fair Trade:** Focuses on fair labour practices and community impact.
- **Responsible:** Highlights comprehensive responsible practices in sourcing, labour, and environmental impact.

Conclusion

Claiming your jewellery is "ethical" is risky, without comprehensive and transparent practices, it can be seen as misleading or superficial. If you choose to use the term, you must provide a clear explanation as to why you consider your jewellery to be ethical, which is signposted, or otherwise easy and obvious for customers to find. For example, on a website you could have a hyperlink to the word ethical linking the customer to a full explanation.

Q. What exactly is a provenance claim?

A. In the jewellery industry, a provenance claim is a statement about where the materials for a piece of jewellery come from and how the piece was made. It includes information like where gemstones and precious metals were sourced and how the jewellery was crafted. These claims are important because they assure customers that the jewellery is authentic and made responsibly.

Q. What should I ensure if I am making provenance claims with regards to gold or gemstones?

A.

- Have systems in place to ensure that the provenance claims are truthful and substantiated by evidence.
- Train your employees to ensure that those who are responsible for implementing the claims and responding to product enquiries, understand the claims and can explain them accurately.
- Make further information available to customers who ask about a provenance claim.
- Members who sell directly to consumers must make available at the point of sale, and on their website, further detail about the claim/s being made, and the systems in place to achieve them.

Q. Can I say that my jewellery packaging is environmentally friendly?

A. Saying your packaging is environmentally friendly on its own, does not provide enough information to be meaningful to the customer. You need to provide more detailed information to explain how your packaging has a better impact on the environment and hold robust evidence of this claim. Bear in mind, The Packaging (Essential Requirements) Regulations 2015 are concerned with environmental impacts from packaging and packaging waste. Businesses (including manufacturers, and retailers) that make or use packaging, or its raw materials are required by law to

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ensure that a certain percentage of the packaging that is placed on the market is recoverable and recycled.

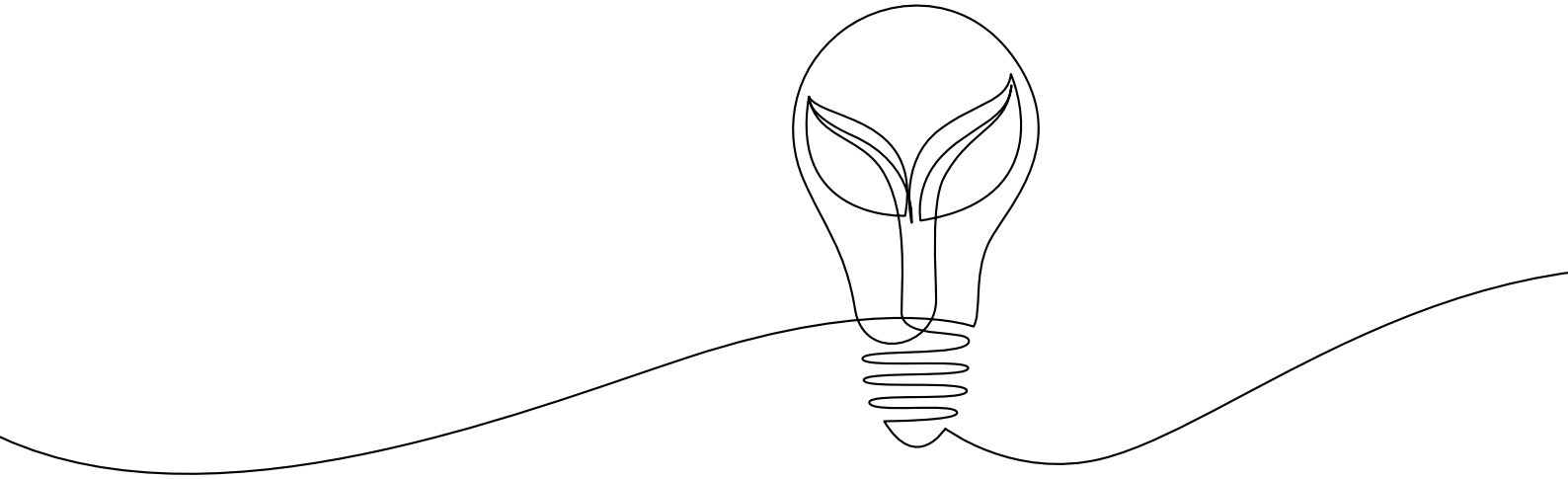
1. Is your packaging made from sustainable, recycled, recyclable or biodegradable materials? Be clear what claims relate to what part of the packaging. For example, the box may be easily recyclable, but the ribbon used to tie it may not be.
2. Be careful of 100% or other absolute claims unless it genuinely can be made for the packaging in entirety, and you have robust evidence to back this up. Consider in and outer packaging, any linings, any labels.
3. Provide evidence of environmentally responsible production processes and other claims made and ensure these are accessible for customers.
4. Have reliable, independent sources verify your environmental claims.

Q. How frequently should I review my environmental claims?

A. All information included in environmental claims should be under continuous review as suppliers may make changes to specifications without making you aware and there may be changes to legislation and technological developments could affect these claims.

Useful Links and Further Reading

- Green claims code: making environmental claims - GOV.UK (www.gov.uk)
- Competition and Markets Authority - GOV.UK (www.gov.uk)
- Home - ASA | CAP
- Digital Markets, Competition and Consumers Act 2024
- RJC-COP-2019-V1.2-Standards-updated-130623.pdf (responsiblejewellery.com)
- ISO/CD 21261-3 - Jewellery and precious metals — Responsible precious metals — Part 3: Requirements for recycled gold
- Laboratory-Grown Diamond Guidance - CIBJO
- CIBJO-Responsible-Sourcing-Blue-Book-2019-01-06.pdf
- CIBJO-Special-Report-2024-Ethics.pdf
- Legislation etc | Business Companion



NAJ Professional Standards Definitions

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Code of Conduct

The NAJ Code of Conduct is a set of rules and standards based on honesty, integrity and professionalism that members MUST abide by. The honouring of this commitment to the Code of Conduct sets members businesses apart from others.

Code of Practice

An NAJ Code of Practice is a set of rules regarding a particular subject. Most often, these Codes of Practice are translations of existing UK law. A Code of Practice provides explanations of how to uphold the law. Members MUST follow these codes in order to remain legally compliant.

Guidance Notes

An NAJ Guidance Note is a document produced to help members better understand their obligations in various areas. Guidance Notes can be on various subjects and are not always based on a specific UK Law. Members are expected to follow these instructions as best practice, although there is no statutory requirement. Guidance notes will be considered by The NAJ Professional Technical Standards Group for elevation to a Code of Practice after a period of two years has elapsed since their publication.

Disciplinary Procedure

The NAJ Disciplinary process is a series of steps that the NAJ can take to address member behaviour that falls short of the expectations as set out in the Code of Conduct.

These documents are live documents and subject to continued review; they can all be accessed on the NAJ website here; Codes of Practice (naj.co.uk)

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NAJ Disciplinary Procedure Tree

