

-
-
-

Green Storytelling

“Keeping It Real”

Scott Keller

Warner Norcross & Judd LLP



•
•
•

FTC Green Guides

- **Issued in 1992**
- **Revised in 1996 and 1998**
- **Proposed revisions issued
October 6, 2010**
 - **Comment period closes
December 10, 2010**



-
-
-

FTC Green Guides

“In recent years, businesses have increasingly used green marketing to capture consumers’ attention and move Americans toward a more environmentally friendly future. But what companies think green claims mean and what consumers really understand are sometimes two different things.”

FTC Chairman Jon Leibowitz



•
•
•

Proposed Changes

No More UNQUALIFIED General Claims

- “Green”
- “Environmentally Friendly”
- “Eco-Safe”



• • • • • • • •

-
-
-

Proposed Changes

Degradable
Biodegradable
Photodegradable



-
-
-

Proposed Changes

Compostable



•
•
•

Proposed Changes

Recyclable – 3 Tiers of Availability

- Substantial Majority – unqualified
- Significant Percentage
- Less than a “Significant Percentage”



• • • • • • • • • •

-
-
-

Proposed Changes

**Ozone-Safe /
Ozone-Friendly**



-
-
-

Proposed Changes

Free-of/Non-Toxic



-
-
-

Proposed Changes

Certificates and Seals of Approval



-
-
-

Proposed Changes

Made with
Renewable Materials



-
-
-
-
-
-
-
-

-
-
-

Proposed Changes

Made with
Renewable Energy



-
-
-
-
-
-
-
-

-
-
-

Proposed Changes

Carbon Offsets



-
-
-
-
-
-
-
-

-
-
-

What To Do

**The More Specific
The Better**



-
-
-
-
-
-
-
-

-
-
-

What To Do

Substantiation.
Substantiation.
Substantiation.



•
•
•

eMaterials

Available on The Right Place

website: www.rightplace.org

- 1. Current FTC Green Guides**
- 2. FTC Two Page Summary of Proposal**
- 3. WNJ E-News Alert**



• • • • • • • • • •