

# NAD Addresses Green Claims About Current Practice and Future Goals

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As more companies develop Environmental, Social, and Governance (“ESG”) goals and advertise their progress towards those goals, we’re starting to see more challenges to those ads. Most of the challenges come from plaintiffs’ attorneys or competitors, but today’s post is about an inquiry that NAD initiated itself into claims that Georgia-Pacific made for its Quilted Northern Ultra Soft & Strong Bathroom Tissue.

The decision covers a lot of ground. For today, though, we’ll focus on an issue that we [previewed](#) earlier this year – the distinction between claims about what a company has already done versus what it plans to do.

Georgia-Pacific advertises that “3 trees [are] planted for every tree used.” In support of its claim, the advertiser explained that when it produces its paper products, it sources trees from “working forests” where a tree is regrown for each tree used. In addition, it has an agreement with the Arbor Day Foundation in which the Foundation has agreed to plant two trees for every tree used during the production process. Based on this evidence and a spreadsheet showing how the company tracked how many trees were used and planted, NAD determined that the claim was substantiated.

Georgia-Pacific also advertised that it planned “to plant 2 million new trees by the end of 2021.” Aspirational claims can be tricky. Because they inherently involve things that have not yet occurred, it can be harder to substantiate them. Still – as the [pending lawsuit against Coca-Cola](#) demonstrates – that doesn’t mean that they are off-limits to a challenge. NAD noted that if an “aspirational claim includes specific, objective goals . . . it is incumbent on an advertiser to provide evidence that it is committed to its stated goal and has taken action to realistically reach it.”

In this case, the evidence Georgia-Pacific presented to support its “3 trees planted for every tree used” claim also helped to support the aspirational claim. Its tracking document showed how many trees had been used in 2021 and projections of how many more would be used. When considered in conjunction with the evidence that Georgia-Pacific planted three trees for each of those used, NAD determined that the claim was supported by a reasonable basis in evidence.

Whether you’re talking about what you’ve done, what you’re doing, or what you plan to do for the environment, it’s important to have evidence to back that up. What you need for future aspirational claims may vary, but make sure you have a reasonable plan to achieve your goal and that you can demonstrate that you’ve made some progress on that path. Simply having an aspiration is not going to be enough.

Next week, we’ll look at another type of claim addressed in the decision – claims about

“sustainability.”