

Print and Paper have a great environmental story to tell

Tim Davie
CEO, BBC Worldwide & Director, Global
BBC Broadcasting House
Portland Place
London
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Dear Mr Davie,

Re: Misleading Environmental Claims

“More people are choosing to receive household bills and information by email, amid growing concern for the environment. Although TV Licensing uses sustainably sourced or recycled paper for all direct mail, the paper saved as a result of electronic communications accounts for around 1,600 trees across the UK.”

It has come to our notice that the BBC is using a vague and unclear statement about the use of electronic communications resulting in conservation of 1,600 trees across the UK. The claim does not specify what the aforementioned electronic communications is regarding exactly, or in what capacity it occurred. This poses the danger of misinterpretation and misleading customers.

Two Sides assumes the claim concerns the BBC proposal to move to e-TV licensing and a claimed positive environmental impact occurring due to the use of electronic communications. The BBC is encouraging customers to switch from a paper TV licence to an online e-TV licence on the basis of an unsupported environmental claim, which we believe cannot be reliably substantiated. Please find enclosed screen grabs of the official TV Licensing site.

My organisation, Two Sides, which represents The Graphic Communications Industries, is concerned that incorrect and damaging impressions are being given out by initiatives such as yours. Whilst we clearly see the efficiency of electronic communications and encourage the reduction of waste in these initiatives, they are often being promoted as ‘green’, or seeking to gain credibility, by purporting to aid sustainability at the expense of the print and paper industry.

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The BBC quotes **100% Replanted** online calculator (<http://www.replanttrees.org/index.htm>) as the source of their tree saving statistics, asserting that **“the paper saved as a result of electronic communications accounts for around 1,600 trees across the UK”**. The two organizations behind **100% Replanted**, *Trees, Water & People* and *Your True Nature Inc.*, claim the online calculator is able to determine the number of trees used to produce the total amount of paper consumed by a business or an individual. However, it can be amply supported by research¹, that generic life-cycle assessment (LCA) calculators, such as the one made available online by **100% Replanted**, rely on industry-wide data to draw broad conclusions about the environmental impacts of paper. By design, a generic or streamlined LCA does not account for potential variations in the lifecycle of paper, user behaviour, or manufacturing impacts in mills or countries of different origins.

According to the ISO 14040 and 14044 standards, full LCAs should be peer-reviewed by a multi-disciplinary team of subject-matter experts and include detailed sensitivity analyses. These are steps that generic LCA calculators do not take². Given the importance of specifics and the scope of variation, it is clear that generic calculators represent only the beginning of a process³. When discussing the environmental footprint of printed versus digital communications, the LCA methodology requires careful thinking and expert input on specific supply chains to ensure substantiated results⁴.

The Committee of Advertising Practice⁵ states in rule 11.4: “Marketers must ensure claims that are based on only part of the advertised product’s life cycle do not mislead consumers about the product’s total environmental impact.” The BBC’s claim that **“the paper saved as a result of electronic communications accounts for around 1,600 trees across the UK”** is therefore misleading as it is not substantiated by evidence coming from a trustworthy, credible or relevant source.

The BBC also asserts that **“Aside from the environmental impact, customers who move their licence online benefit from the speed and simplicity of being able to access their licence details over email”**, which overlooks the fact that consumers may print copies of their TV licence to create a permanent record. In a study conducted on behalf of Two Sides, which investigated printing habits of consumers in the UK, it was revealed that 38% of consumers are clearly ‘home printers’ with 26% printing up to 20% of their bills and 7% printing out between 80% and 100% of their bills⁶. The BBC does not take under consideration that whilst distribution of TV licenses via e-mail decreases the amount and cost of paper used by the company, the amount and cost of paper used will pass onto the consumer if they wish to print their TV licence.

It must also be considered that, according to ONS Q3 2013 data, 14% adults in the UK have never used the Internet⁷ and 49% of the lowest socio-economic groups have no access to the Internet at all⁸. This digital divide means that a significant percentage of TV license buyers need to retain a printed copy of their license for a permanent record. A printed option is certainly something which should be offered to customers, who are unable to maintain electronic records of their documents.

The linkage made by you between reducing the use of paper and helping the environment creates a false impression about the sustainability of print and paper and creates concern amongst the many companies that Two Sides represents.

It is increasingly clear that electronic communication and, in particular, the energy requirements of the increasing worldwide network of servers which are necessary to store all the information needed for immediate access, has a significant and growing carbon footprint. Electronic document storage must be recognised as delivering efficiency but not sustainability. In the UK it has been suggested that PC's and servers may consume up to 50% of household energy requirements in the next 10 years⁹.

In England, there has been no shortage of trees. Paper is a renewable and recyclable product that, if responsibly produced and consumed, is an environmentally sustainable media. It is often surprising to learn that in Europe, where 93% of our paper comes from, the area of forest has grown by 30% since 1950 and is increasing at a rate of 1.5 million football pitches every year¹⁰.

I would be grateful if you would therefore reconsider this message **“Although TV Licensing uses sustainably sourced or recycled paper for all direct mail, the paper saved as a result of electronic communications accounts for around 1,600 trees across the UK”**, and ensure that, issuing electronic licences, you do not damage the Print and Paper industry, and jeopardise the livelihood of the many thousands of people employed therein with possibly misleading statements.

Please find attached extracts from CSR Europe's Sustainable Marketing Guide, which would appear be at odds with your marketing initiatives and the new Code of Advertising Rules (CAP) - The extract re Environmental Claims.

If we do not hear from you, we will report the BBC to the Advertising Standards Authority (ASA), and advise our industry via press releases about the action we are taking. In recent similar conversations with leading UK companies such as BT, British Gas and Barclays we have been able to quickly find an amicable solution.

With thanks for your consideration

Yours



Martyn Eustace
Director
Two Sides

cc. Head of Legal Department

Sources:

1. [Are 'Go Green-Go Paperless' claims supported by sound and verifiable evidence, Two Sides Facts.](#)
2. [International Standardization Organization, 2006. ISO 14040:2006 - Environmental management - Life cycle assessment - Principles and framework.](#)
3. [Venditti, R. 2012. Effect of Methodology on the Life Cycle Analysis of Paper Products. North Carolina State University, Department of Forest Biomaterials.](#)
4. [American Center for Life-cycle Assessment and Institute for Environmental Research and Education, 2008. Guidance for Multi-Stakeholder Life Cycle Scoping, with a Food Container Example.](#)
5. [Advertising Standards Authority, 2010. The CAP Code - The UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing, Edition 12.](#)
6. [Paper Bills and Statements; A Real Necessity in A Digital World, Two Sides, 2013.](#)
7. [Internet Access Quarterly Update, Q3 2013, Office for National Statistics, 2013.](#)
8. [Keep Me Posted: Paper and Digital Communications: the case for consumer choice, 2013.](#)
9. [Costing the Earth, Virtual Warming, BBC Radio 4, 23 April 2009.](#)
10. [Two Sides, Briefing Facts Documents, 2013.](#)

Papers included:

- A. Screen grab of the BBC TV licensing website page
- B. Screen grab of 100% Replanted online calculator
- C. CSR Europe's Sustainable Marketing Guide
- D. Code of Advertising Rules (CAP) - The extract re Environmental Claims.