



1. Revision justification

Anthesis Climate Neutral Group has decided to revise some components of the Trademark & Claims Policy (vs 2.2), in order to (1) facilitate that certified clients can be compliant with upcoming green claims legislation (e.g. the [EU Green Claims Directive](#) & [EU Directive on Empowering Consumers for the Green Transition](#), and similar legislation e.g. in the UK and USA), but also (2) to enhance overall programme improvement, (3) to meet client needs and especially (4) to facilitate integration of the Anthesis and CNG organisations.

The Trademark & Claims Policy is one of the core Programme Documents of the Certification Programme, hence this revision process follows the rules and procedures set out in the [Procedure for the revision of the CNG Climate Neutral Certification Program vs1.0](#) (October 2021). For this revision of the Trademark & Claims Policy, 'Article 2.3: Urgent Revisions' has been applied. An urgent revision process includes a restricted stakeholder consultation process, targeted to a selection of topics and/or (a sample of) stakeholders directly impacted by the proposed changes. The justification for a so called 'urgent' revision process and limited stakeholder consultation on selected topics is two-fold:

- 1) The **rapidly changing regulatory context** (e.g. the draft EU Green Claims Directive) requires Anthesis to act fast to facilitate that our certified clients can make use of a trademark and associated claims which are compliant with these upcoming regulations.
- 2) The revision does **not encompass** the criteria of the **Standard**. The revision is purely aimed at a selection of proposed changes related to the Trademark & Claims Policy, and as per [ISEAL Codes](#) therefore does not require full consultation.

Note that not all below (proposed) changes are up for consultation, only **those where it is explicitly mentioned** (in orange).

2. (Proposed) changes

Annex 1 contains an excerpt from the original Trademark & Claims Policy, version 1.2, in which all (proposed) changes are incorporated. Changes highlighted in **yellow** are up for consultation, whereas changed highlighted in **green** are for information-sharing purpose only. A summary of all changes, including the rationale, is given below:

A. New Programme branding, new names, new logo's, new claims; new narrative

- Although the content of the Standard and the Assurance Protocol have not changed, all **Core Programme Documents, the website, promo material, etc will undergo a rebranding** and their lay-out will be adjusted to the Anthesis house style. This implies that the Programme will be fully operated by Anthesis (and not CNG anymore) from the 1st of January 2024.
- To meet the Anthesis strategic vision and to be aligned with upcoming legislation, the **names and titles** associated with the Certification Programme have also changed
 - Programme name: Climate Activator Certification Programme
 - Programme owner: Anthesis



- Name of the trademark: Climate Activator Trademark **(NAME OF THE TRADEMARK IS UP FOR CONSULTATION)**:
- Name of a certified client: Climate Activator Certified
- Two new logos have been developed: a **Programme Logo** as part of the programme branding, and a **Trademark Logo** that clients may use as part of (on or off-pack) claim-making upon a positive certification decision, representing their compliance status. **(LOGOS ARE UP FOR CONSULTATION)**
- Legislation demands clear and transparent claims that can be understood by consumers. The **claim** (as part of two proposed logo's), clearly represent what the Certification Programme aims to achieve: **Avoid, Reduce and Remove CO2 emissions** and/or **Minimizing CO2 emissions** **(CLAIM IS UP FOR CONSULTATION)**. However, this is still ambiguous, hence we are also considering the introduction of a QR Code system to further clarify and substantiate claims, see hereunder.
- Upcoming legislation will ban any claims stating that a product or organisation has a neutral, reduced or positive impact on the environment because of emissions offsetting schemes. As a result, the new **narrative makes a clear separation between internal reduction and offsetting**, whether achieved through avoidance, reduction and/or removals in- or outside the value chain.

B. Introduction of online platform (and QR Code system) to increase of transparency

- Besides the need to make green claims **as clear as possible for consumers**, legislation will also demand that all claims and trademark use should be **substantiated with real evidence** and this evidence needs to be made available in the **public domain**.
- To enhance this, Anthesis will develop and introduce an online platform (as part of the Certification Programme website) in 2024, to allow consumers via one-click away to access compliance information (i.e. compliance details on the certification status of the certified company and/or product).
- This 'one click away' can be facilitated by accompanying a Trademark or claim (on- or off-pack) with a **QR Code** or a **URL link** (or both). **(THE PREFERRED METHOD TO ALLOW FOR 'ONE-CLICK-AWAY' -QR CODE OR PERSONALISED URL LINK (OR BOTH)- IS UP FOR CONSULTATION)**.
- The information that must be made publicly available can **initially be limited (during the transition phase 2024/25)** to e.g. certification scope, averaged footprints and reduction targets, reductions achieved, type of offsets used, etc. **(THE CONTENT THAT WE MAKE MANDATORY IS UP FOR CONSULTATION)**. We will give certified clients **the options to choose to disclose more information**. However, once the new legislation comes into force (expected in 2026), we are required to make more information public, as will be requested by law.

C. Revised programme fee amounts and structure

- Aligned with general price increases globally, we also need to **revise our programme fee structure**. From 2024 onwards, the programme fee will be calculated in the same way for all certification scopes (C-PROD, C-SERV, C-ORG), and all are based on **certified volume T CO2**. New clients will pay the full new fee rate (100%) directly from start (as if 2026 fee). For



existing clients, however, a discount model for 2024 and 2025 applies so that they are gradually impacted by price increases.

- In addition, we have revised the rules around **programme and offset fee payment time schedule**, i.e. when they are being invoiced, either upfront, retroactively or with certain time intervals.

D. Updated rules around the approval procedure of claims and trademark use

- The approval rules around claims and trademark use will be maintained, but **the content of the claims will need to be aligned** with the new **Programme branding** and **(draft) legislation**.

3. Stakeholder consultation process

Selected topics for consultation

Based on the above, the topics selected to be up for consultation are:

- a. The name of the trademark;
- b. The design of the new logo's;
- c. The content of the permitted claims;
- d. The data to be shared on public platform for transition period 2024/25;
- e. The preferred method to allow for 'one-click-away': QR Code, URL link or both.

Selected stakeholders

The following stakeholders are consulted on the selected topics:

- a. Square root sample of current client portfolio, based on selective sampling (major client accounts, strategic client accounts);
- b. Major end-users (retailers), representing the consumer perspective;
- c. Authorities that are charged with the development, implementation and oversight of upcoming claims legislation, e.g. ISEAL, Milieucentraal, etc (although note that many of these authorities need to remain impartial);
- d. Internal stakeholders, i.e. Anthesis Board, Regional Sales Leads;
- e. Advisory Committee representing all stakeholders, tasked to oversee the development and implementation of the Certification Programme.

Process

1. Contact selected stakeholders, either by e-mail, Microsoft Teams, in a meeting and at the convenience of the stakeholder.
2. In Stakeholder Feedback Form, record all stakeholders and their opinions.
3. Final decision-making is based on consensus, and in the case of absence of consensus, by majority vote by the Certification Team + Anthesis Management + Advisory Committee.
4. Questions related to the process can be directed to: certification@climateneutralgroup.com.



4. Timelines

(May be delayed with +/- 1 month depending on progress made)

Time	Activities & Deliverables
Feb '24	Updated draft version of Trademark & Claims Policy + Revision Procedure developed and shared with stakeholders.
Feb '24	Mailing on new fee structure. Structure operational from 1 st of Jan. 2024 (including a transition period)
Feb - Mar '24	For the selected topics for consultation, stakeholders can provide input.
Mar - Apr '24	Processing stakeholder feedback, development of revised Trademark & Claims Policy
Apr '24	Rebranding of all Core Programme Documents
May '24	Publication of rebranded core Programme Document Documents including revised version of Trademark & Claims Policy
May '24	New narrative developed (including development of marketing campaign, website relaunch, new promo material, new slide decks, etc)
May '24	Launch marketing campaign
June '24	Climate Activator Summit = (online) stakeholder event to announce rebranded Certification Programme (and -optionally- to share the first high-level propositions for review of the other Programme Documents)
June '24	Train stakeholders on new content – month of January - Internal support for CBs, sales account managers, and consultants - Webinar for clients
June '24	Public platform (and QR Code system) development and gradual roll out