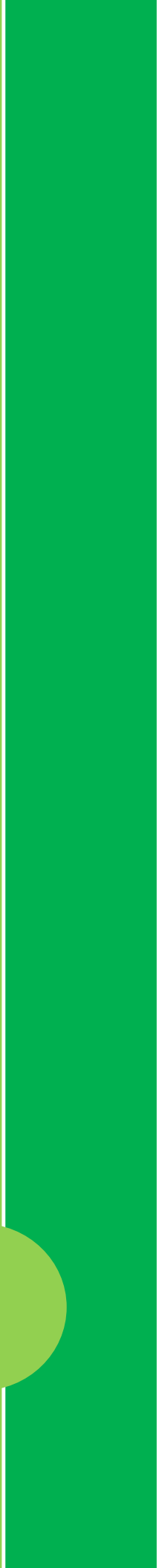


RECOMMENDATION FOR DIRECT MAIL AND THE ENVIRONMENT



FEDMA
July 2008





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RECOMMENDATION FOR DIRECT MAIL AND THE ENVIRONMENT

I. Introduction

Direct Marketing¹ is a critical part of any communications strategy for consumers, the economy, governments, fundraisers and charities. The European direct marketing sector generates expenditure of over 60 billion Euro and employs over 2 million people directly, and many more indirectly, within the EU. The Direct and Interactive Marketing Industry covers elements such as catalogues, direct mail and e-communications. It is rapidly becoming the most popular communications channel for marketers.

FEDMA members are substantial users of postal services and are a growing sector of the mail market.

The Direct Marketing industry seeks to maximise the response rate of all its communication campaigns as this is the most environmentally sensible and cost-effective method of operations. Nevertheless, FEDMA members recognise that additional actions are essential to support its environmental objectives.

FEDMA

The Federation of European Direct and Interactive Marketing (FEDMA) represents the direct marketing sector at European level. Its national members are the Direct Marketing Associations (DMAs) representing users, service providers, and media/carriers of direct marketing. FEDMA also has over 200 company members in direct membership. FEDMA indirectly represents over 15,000 companies, throughout Europe and beyond.

The use of Direct Mail as a medium has the following benefits:

- Companies, governments, local authorities and NGOs can inform citizens of goods or services in which they have a specific interest and hence widen the choice for consumers
- It allows citizens to receive services/information which they specifically want
- It helps voluntary organisations such as charities to reach citizens in order to get support and funding
- It supports the democratic process by aiding politicians to get their messages to their electorate
- It reduces waste through highly targeted marketing campaigns operating under the policy guidelines used by Direct Mail companies such as Preference Services and Suppression Files;

¹ Direct marketing is an integrated marketing strategy aimed to create and maintain a long term interactive relationship with the consumer by meeting his concerns through the use of interactive channels and database techniques stimulating response and building brands.



- Start-up companies or small companies with small budgets can use direct mail to start their marketing programmes.

FEDMA has taken into consideration experiences at national level in creating these Recommendations. Most direct marketers incorporate environmental sustainability as a key element of their corporate strategies. Several national Direct Marketing Associations (DMAs) have already adopted self-regulatory measures. These range from environmental charters, direct mail and promotions, producer responsibility schemes, initiatives on waste and use of recycled paper, or handbooks on environment-friendly direct marketing.

Some of these measures are aimed at advertisers, producers of direct mail, envelope manufacturers, printers, and those involved in auxiliary activities (e.g. delivery agents and envelope manufacturers).

This document gives some detailed examples of actions - relevant to the European marketplace - that can be taken by national DMAs as well as individual companies. These actions serve as best practice exemplars and can be used to develop environmentally sustainable corporate policies.

The main objectives of this Recommendation and the Checklist are to:

1. Encourage best practice amongst FEDMA's members and the national DMAs' members
2. Provide members with the tools and information to achieve the objectives in their operations support and further responsible practices in the direct mail industry
3. Promote awareness and perception amongst EU citizens, European and national policy makers and the media (radio, TV and newspapers) that the direct marketing industry is responsible and contributes substantially to the sustainability of the Environment.

II. Recommendations

1. List preparation (List hygiene and data management)

(NB: Most of the following is also required by Data Protection legislation.)

1.1 You should adhere to the national Mail Preference Services (Robinson lists²) for all countries into which you plan to market. This includes the use of all relevant Mail Preference Services, including Change of Address and deceased files.

1.2 Marketers should maintain in-house do-not-mail (suppression) lists of customers or prospects who do not wish to receive mailings. You should provide periodic notices and opportunities for customers to opt out of receiving future marketing contacts from the marketer³.

² A Robinson List or Mail Preference Service is a list of all the consumers (names and addresses) who have indicated that they do not wish to receive unsolicited direct mail.

³ Companies should offer customers the opportunity to opt out from receiving commercial communications, and direct marketing associations should give guidance to their members and the consumers in the member state, for example, see: http://www.idma.ie/pdf/IDMA_Guide_on_how_to_stop_unsolicited_commercial_communications.pdf



1.3 Members should use up to date “gone-away” and “change of address” files, so that consumers who have moved don’t continue to have marketing material sent to their old address. Make sure that all addresses on undelivered mail lists are blocked from future mailings.

1.4 Adhere to the FEDMA Code of Practice on the use of personal data. Using, buying or selling data should follow FEDMA’s and national DMAs’ Best Practice guidelines and Codes of Conduct.

2. **Design and Production of Mailings and Packaging**

2.1 Encourage your paper suppliers to increase wood fibre⁴ purchases from recognised forest certification programmes⁵.

2.2 Avoid using paper that has been produced with fibres from unsustainable or illegally managed forests.

2.3 When selecting paper for a mailing, use the best mix between virgin and recycled fibre without compromising on image quality and a positive response from potential consumers.

2.4 Ensure that your production methods reduce over-runs, waste allowance and in-process waste to the minimum: use lighter-weight papers when possible, or reduce the amount of paper used when feasible.

2.5 Use environment-friendly designs for the production of direct mail and promotions material.

Members should favour the eco-design of all products or services delivered within a direct marketing campaign. They should consider all aspects of the production cycle using a number of criteria (see checklist below) to include materials used in packaging and envelopes, and promotional material.

Some examples of environment-friendly solutions are:

- Recycled paper
- Recycled plastics
- Lightweight materials
- Decreased packaging
- Use of vegetable inks
- Elimination of toxic materials.

2.6 Encourage your packaging suppliers to include alternative solutions for environment-preferable

⁴ Since paper is mainly made either from recycled materials or from the parts of the tree left over after the trunk of the tree has been trimmed, paper manufacturers therefore only use raw materials which would otherwise be incinerated or sent to landfill.

⁵ E.g. Forest Stewardship Council (FSC) at <http://www.fsc.org/> or Programme for Endorsement of Forest Certification Scheme (PEFC) at www.pefc.org



packaging in their quotations.

2.7 Make your distribution centres efficient and environment-friendly (energy, water and waste management) and respect relevant environmental laws.

2.8 Use delivery methods that are environmentally sustainable. For example, maximise the energy efficiency and capacity of your transport network, and optimise delivery routes to reduce unnecessary travel.

3. **Unaddressed Mail**

Last mile delivery operators – except for special exemptions – should comply with delivery restrictions expressed on letter-boxes, such as “stop pub” stickers. Remember to take into account the number of letter-boxes involved in this “opt-out” system, when ordering the amount of materials to be printed and posted.

4. **Pollution, Reduction and Recycling**

4.1 Members should continue to encourage the collection and recycling of direct mail and promotional material, e.g., by raising awareness, or encouraging receivers to recycle.

4.2 Ensure that all your environmental labelling is clear, honest and complete so that the consumer knows the exact nature of what is being claimed.

4.3 Use recycled paper in your office supplies and packaging materials. Encourage your people to use the phone or email to take orders, reply to enquiries, and for internal office communications.

4.4 Try and use the Mobius⁶ loop on all paper-based communication to let your consumers know the percentage of recycled material being used. Remind them to recycle the paper-based materials.

5. **PR and Communications**

5.1 If you’re doing a good job on keeping the environment safer, then let people know about it. And hopefully others will take up similar practice.

5.2 Let your consumers/customers the ‘how and where’ of recovery facilities in your own Member State.

III. Checklist for good environmental practices

The *FEDMA Environmental Checklist* is a tool designed to help you – advertisers and suppliers - as members to reduce the environmental impact of your activities at each stage of the direct marketing process. Any organisation involved with Direct Marketing should know how the materials they’re using

⁶ For an example of the Mobius loop, see: <http://en.wikipedia.org/wiki/Image:Recycle001.svg>



are produced and whether they can be recovered or recycled. They should understand how to minimise waste through good design, testing, and data hygiene and management.

And you need to communicate your environmental commitment to customers, consumers and employees. There is increasing evidence that environmental awareness, profitability, and corporate social responsibility aren't mutually exclusive — in fact, they actually complement one another. Being aware of the environmental impact of what you do — and responding appropriately — is simply good business and good corporate citizenship.

The *FEDMA Environmental Checklist* will help convert key environmental principles such as reducing waste, conserving energy and conservation of natural resources into specific action points.

Different legislative requirements and infrastructure across Europe may mean that some of these action points are already standard practice or can't be implemented immediately.

Use this checklist to help identify what you can do today, and as part of a long-term environmental strategy for your organisation.

Effective campaigning through direct marketing has some major benefits. First of all, it decreases your environmental impact significantly. Also, when done correctly, substantial savings of financial resources can be achieved. And thirdly, as consumers become more and more aware of environmental issues, effective and environmental responsible campaigning can be used as a competitive advantage.

Each section starts with an explanation of what is covered and why it is important. It's followed by a number of questions to guide you to the actions and processes that will reduce your impact on the environment. These are questions that you should be asking yourselves (if carrying out the activity) or your supplier.

Individual sections of this checklist can be used on their own if required, but this tool will be most effective if it is used in its entirety. The first two sections outline generic practices that apply to your organisation in general. The other sections detail the steps to create an environmentally sustainable direct mail campaign.

Corporate Commitment

Introduction

The ongoing support of Senior Management is essential for success and ideally this should be underwritten with a formal, written corporate commitment:

- To minimise the organisation's impact on the environment, and
- To improve continuously their environmental responsibility.

(If appropriate, members may want to achieve formal accreditation through a recognised environmental management system such as ISO 14001 or EMAS)



Corporate Commitment checklist:

Have you:

- Written an environmental policy statement that outlines exactly how you will measure and evaluate the improvement you make on your environmental impact?
- Appointed a senior executive to lead on environmental issues? Are they empowered to develop and implement environmental policy for the company? Do they have to report regularly to the Board on progress?
- Created an environmental team that includes executives from all key departments? For example, from purchasing, marketing, printing, design, and production?
- Communicated your policy to all employees? Have you tested whether they understand it and whether they see the importance of having such a policy? Do you provide opportunities for employees to contribute their own ideas? Do you actively seek (and maybe reward?) their suggestions?
- Produced a guide or manual of best practice for internal use? How do you track whether it is being used?
- Set up systems to track and report your progress?
- Spoken to your suppliers so that they can help you meet your environmental commitments? Have you reviewed your purchasing to make sure that that you are using the most appropriate products and suppliers? Have you asked suppliers for evidence of their environmental commitment?
- Thought about forming partnerships with other companies, environmental groups or local community groups?

Decreasing waste in the workplace

Introduction

The primary purpose of this “checklist” is to provide a tool to reduce the environmental impact of an organisation’s direct marketing communications. However, there are wider issues that you should consider as part of your corporate environmental policy. Don’t overlook the potential for reducing consumption of precious resources such as energy, and reducing waste in offices, warehouses and production plants.

Here’s a checklist of some simple actions that can be easily implemented and that can have a real impact on the use of resources and the production of waste.



Decreasing waste in the workplace checklist

- Do you use both sides of every piece of paper before throwing it away or recycling? Do you use unwanted one-sided copies as scrap paper?
- Have you any reminders for staff not to print out e-mails except where necessary?
- Do you re-label/re-use file folders, hanging folders, and binders? And re-use packaging materials and pallets?
- Do you re-use internal mail envelopes?
- Is there a policy to remove staples and paper clips before documents go for recycling?
- Do you use recycled paper and packaging materials? If not why not?
- Have you visited any similar businesses with existing programmes to help you understand what can be done and exchange ideas?
- Do you support recycling in your local community by:
 - Volunteering your company's resources
 - Setting up collection points on your grounds
 - Participating in, or creating an, award/recognition scheme to publicize your company's commitment to recycling?
- Do you monitor and evaluate your performance? Company-wide? By department/function?
- Do you turn off lights, computers, printers and other office equipment during non-business hours?
- Have you carried out an energy audit to determine exactly what is using the most energy? Many utility companies offer this service or you can simply use meters to monitor energy use.
- Do you have programmable thermostats to control your office climate during non-working hours?
- Do you use natural light whenever possible? And fluorescent lights, low-voltage halogen lights or low energy lighting? Do you have occupancy sensors that turn lights on and off as needed?
- Do you have toilets with low flow flushing? Do you have a process for fixing leaking taps immediately?



- Do you promote car sharing and use of public transport? Do you provide any facilities for employees to use public transport and bicycles e.g. secure, well-lit, bicycle parking and showers/lockers?

Design

Introduction

The best place to start minimising environmental impact is at the design phase. Decisions made here can be applied throughout the production process. Creating an environmental action plan with identifiable, measurable objectives, and sharing these goals with agencies, designers, printers and suppliers, will help to keep a direct marketing campaign on the right track.

Environmentally responsible design should be guided by the principles of avoiding toxic materials, minimising waste, increasing recyclability and using environmentally preferable materials. When in doubt, seek assistance. Most European countries offer technical assistance programmes to assist businesses in their environmental practices.

Design checklist

- Are you using as little paper as possible? Have you considered different formats that will reduce paper use?
- Are you using the lightest stock that can be effectively used for each campaign?
- Have you designed all elements to make the most efficient use of space within the pack?
- Are you printing on both sides of the paper? If not, what is the reason?
- Have you discussed the design with your printer to:
 - Identify optimal formats and most efficient trim size
 - Reduce the number of components
 - Explore what else can be printed in the same printing process
 - Make use of their technology, e.g. do they have digital print capability?
- Have you evaluated each element of the pack to ensure that there isn't anything that can't be easily recycled or re-used? If a particular component, or material, can't be easily recycled have you investigated alternatives with suppliers and/or tested them?

Data Hygiene and management

Introduction

Direct Marketing campaigns are based on databases of names and addresses of the target audience. Therefore, making sure that data is accurate and up to date is essential to avoid both a waste of money



and wasted physical resources (such as paper and energy), and thus ensures that a Direct Marketing campaign has a minimum environmental impact⁷.

Clean, accurate and up to date data means that there is less chance of wasted communications – whether they are electronic or print – and therefore reducing the environmental impact of your campaign. The checklist below can be used whether you carry out the data processing yourself or use an external supplier.

Data hygiene and management checklist

- Have you a formal process in place for regularly maintaining data hygiene? Does this include external data sources e.g. change of address services?
- Do you update your customer lists according to the undelivered mail that your postal operator returns? Do you contact these customers by another means to discover their correct address details?
- Do you provide regular opportunities for your customers and prospects to tell you their preferences about when, or whether, they wish to receive communications, and by which channels?
- Do you maintain in-house suppression lists of customers and prospects who do not wish to receive communications? Do you update these lists according to the undelivered mail that the postal operator returns? Do you use the national Preference Service/Robinson lists where available?
- Do you use any screening for external or bought-in data? Do you ask for proof that it has been screened against relevant suppression files and your in-house data?
- Do you use “deceased” data sources (where available) to screen your data before any campaign?
- Do you use multiple match definitions to minimise duplication when using multiple data sources?
- Do you use computer-modelling techniques to improve the targeting of your communications? Have you tested alternative models?
- Do you offer customers any incentives (such as a discount on their next purchase) to notify duplicate communications and/or inaccuracies?

⁷ The Data Protection Directive (95/46/EC) states that “...personal data must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that data which are inaccurate or incomplete, having regard to the purposes for which they were collected or for which they are further processed, are erased or rectified”



- Do you use address correction software (for all communication channels) to ensure accuracy of all incoming data? Have you specified a standard record format to help with identification of duplicate records?
- Do you test samples of a list before communicating to the whole list? Do you test different versions of offers, creative treatments or even catalogues?

Paper

Introduction

Paper production uses a large amount of energy. European paper and board producers have committed to reducing fossil fuel carbon dioxide emissions by 20% by 2020. Already, they are the biggest users and producers of renewable energy European wide. Fibres used in virgin paper production contain high proportions of saw-mill waste and forest thinnings. Sustainable forest management increases forest area, increases bio-diversity and captures carbon emissions. Cellulose fibres naturally store carbon instead of releasing it to the atmosphere. Recycling can extend this period of carbon storage.

Paper is now the most recycled product in Europe. If you use large quantities of paper, ensure that you have staff who understand paper production and distribution, and have them visit paper mills and suppliers in order to fully understand how paper is produced and recycled.

Paper checklist

- Have you evaluated (or have you asked your supplier to evaluate) all the paper you use to identify opportunities to increase recycled content? Can you eliminate the use of paper and paper products made from 100-percent virgin fibre content without reducing response rates?
- Have you asked your paper suppliers where your paper comes from? Do you (or your suppliers) specify that your paper is made from fibre from certified, sustainably managed forests?
- Do you regularly meet with other organisations that buy/use paper to learn what they are doing?
- Have you (or have you asked your supplier) to use papers processed without chlorine or chlorine compounds when they are available?

Printing, inks and adhesives

Introduction

The printing process has a big impact on the environment. New technologies and techniques can now minimise that impact. Techniques like digital print and computer-to-plate (CTP) printing help reduce chemical and paper waste, and emissions to air. Some adhesives are more beneficial to the environment than others, and should be used whenever possible.



Whether you use an external printer or do-it-yourself, the checklist below (together with the design and paper checklists above) provides a good starting point to monitor environmental performance.

Printing checklist

- Is paper waste being recycled? How?
- Can the job be printed with ink that has minimal Volatile Organic Compound (VOC) content? How about recycled ink? Soy ink?
- What is being done to minimize ink waste, and recycle ink?
- What is being done to minimise air emissions to the environment, e.g., Volatile Organic Compounds (VOCs), ozone-depleting substances and air toxins?
- What is being done to reduce chemical discharges to sewers and other water sources?
- What is being done to reduce solid wastes?
- Are printing plates recycled? What about recycling film, plastic, pallets, wipes, etc.?
- Can you avoid the use of DIPB⁸-based inks and adhesives, which reduce the possibility of recycling the product?
- What is your supplier's environmental track record? Have there been regulatory violations? Or awards?

Packaging and Fulfilment

Introduction

There are plenty of ways to reduce, re-use and recycle materials in packaging and order fulfilment. The basic policy should be to use the minimum amount of packaging materials with a high recycled content whilst making sure that the merchandise being shipped is sufficiently protected from damage. Here are some questions to ask yourself or your supplier.

Packaging and fulfilment checklist

- Have you developed packaging guidelines? Do these clearly optimise the ratio between the size of the product and the size of the packaging used?
- Have you tested to see whether you can reduce the overall amount of packaging?
- Have you tested lighter weight materials?

⁸ Diisobutyl phthalate: This is commonly found in inks and other chemicals used in printing. It is potentially dangerous because it has a similar structure to androgenic hormones in the human body. If the original paper is loaded with inks, adhesives and other substances, they can be passed into the new recycled material.



- Do you provide a wide selection of package sizes so that there is an appropriate size available for the product? Have you trained packers to use the correct size?
- Have you evaluated the possibilities of improving the packaging materials used to transport unaddressed mail?
- Have you told your suppliers about your environmental policies and practices? Do you encourage them to suggest alternatives?
- Do you re-use existing products such as incoming corrugated cartons or other paper and packaging? How?
- Do you set aside storage space for reusing incoming packaging materials?
- Have you checked to see if the consumer can easily reuse the material? If so, have you told them how?
- Do you recycle your own used packaging? How?
- Do you encourage your customers to recycle packaging? Do you provide recycling information and relevant recycling logos?
- In the case of multiple orders, do you have a procedure in place to group the orders? Do you ask customers whether they are happy to wait rather than sending two shipments to the same customer?

Logistics

Introduction

Logistics can form a substantial part of the environmental footprint of your campaign. Elements such as the source of your raw materials, transportation vehicles, distances, capacities, IT systems, external suppliers can have a negative impact.

Logistics checklist

- Do the raw materials used to produce your campaign materials come from far away? If so, can you use local products instead?
- Have you optimised your company's logistic service, by equipping it with up-to-date and efficient means of transportation? Do you use vehicles with a low environmental impact when possible, e.g., bikes, fuel efficient transporters?
- Do you fully use the capacity of your transportation services, for instance, by never having your vans run half-loaded?
- Do your logistic services use route optimisation software?



- Do you take into account the environmental commitments of an external service provider when using its services?

Communications

Introduction

Many consumers are sceptical of business's commitment to the environment; so communicating environmental policy or your achievements needs careful planning. Done well, it can enhance consumers' perception of the organisation and its reputation in the business community.

Here are some simple questions to ask about whether your communications are effective as possible.

Communications checklist

- Are your messages specific? (e.g. say "Printed on 50% Recycled Paper," not just "Printed on Recycled Paper") Are your environmental claims accurate? Can you verify them if required?
- Do they overstate what you're doing? Be humble and say that you are doing your part, not that you are saving the world!
- Do they emphasise that this is part of a continuing programme? Environmental performance is not something that happens once but is part of a process of continuous improvement.
- Have you researched other companies' environmental communications? Do you know what competitors are doing? Do you know what environmental best practice is in your sector? Have you seen case studies?
- Have you used every opportunity to encourage the consumer to recycle your communications' materials? Use messages like "Please recycle this leaflet/mail pack after reading" or "Read, use and recycle", etc.
- Do you fully understand any environmental terminology if you use it?
- Have you got permission and authority to use logos, terms etc?



FEDERATION OF EUROPEAN DIRECT AND INTERACTIVE MARKETING
Public Affairs & Self-Regulation
July 2008

IV. References

For further reading, FEDMA suggests the following documents:

CEPI (2007) Framework for the development of Carbon Footprints for paper and board products. This document can be found online:

<http://www.cepi.org/docshare/docs/4/BBLPDBDCBJDOKBEKIDMDDGLN59YA47FH4O1TQ7VPB6U3/CEPI/docs/DLS/CarbonFootprintmain-20071112-00003-01-E.pdf>

CEPI (2008) CEPI sustainability report 2007. This document can be found online:

<http://www.cepi.org/docshare/docs/3/BBLPDBDCBJDOKBEKIDMDDGLN5LKGGJFGI4OG5N9YBDTY/CEPI/docs/DLS/CEPIFINALWEB-20071126-00021-01-E.pdf>

FEPE (2008) Factsheet on envelope recyclability.

Intergraf (2008) Printing and the environment. This document can be ordered online:

http://www.intergraf.eu/AM/Template.cfm?Section=Printing_and_the_environment1&Template=/CM/HTMLDisplay.cfm&ContentID=1826

Knut, S. (2008) Climate protection potentials of EU recycling targets. This document can be found online:

<http://www.eeb.org/publication/documents/RecyclingClimateChangePotentials.pdf>

Also, you can contact your local Direct Marketing Association for more information on environment and direct marketing. Contact details can be found at the FEDMA website: <http://www.fedma.org/direct-marketing-associations.347484-60457.html>

Federation of European Direct and Interactive Marketing

Brussels, July 2008