

Revisiting the promise of carbon labeling

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21 **Abstract**

22 Carbon labeling systems can inform individual and organizational choices, potentially reducing
23 the carbon footprints of goods and services. We review the ways labeling has been
24 conceptualized and operationalized and available evidence on effectiveness. The literature has
25 focused mainly on how labeling affects retail consumer behavior but much less on how labeling
26 affects the behavior of the organizations that produce, transport, and sell products despite
27 preliminary research suggesting that effects on corporate behavior may be significant even
28 absent strong consumer responses. We consider key challenges for carbon labeling systems
29 related to standard-setting, data collection and use, and label design. We summarize available
30 knowledge, identify key research questions, and identify steps toward achieving the promise of
31 carbon labeling.

32 Carbon labeling summarizes data on the greenhouse gases (GHG) emitted from the
33 production, distribution, and use (“carbon footprints”) of a good or service in a simple indicator
34 presented at the point of purchase. The goal is to facilitate choices that can rapidly reduce GHG
35 emissions to meet the challenges posed by escalating anthropogenic climate change. Even
36 increasingly aggressive national emissions reduction commitments fall far short of the levels
37 needed to limit warming to 1.5°C or 2°C¹. A commentary in the first volume of this journal²
38 advocated development of “a global private carbon-labeling system” as a low-cost, viable
39 initiative for reducing the carbon footprints of consumer goods and services (hereafter referred to
40 as products).

41 Feasibility is a primary rationale for carbon labeling. Unlike many other GHG mitigation
42 initiatives, information disclosure does not require government actions such as regulations,
43 taxation, or financial incentives, each of which faces barriers in many political systems².
44 Emissions reductions from carbon labeling may also be more rapidly achievable than from many
45 technological innovations, which require time to develop, implement, and diffuse³⁻⁶.

46 Carbon labeling has also been advocated on the grounds of behavioral plasticity, the
47 extent to which the intended responders to an initiative take action⁷. The argument is that
48 information provided by well-designed labeling systems can, alone or combined with other
49 initiatives, increase responsiveness among the intended responders—households, companies, and
50 governments⁸⁻¹². Labeling can help address several impediments to behavioral plasticity among
51 responders, such as: (1) limited or incorrect understanding of the direct GHG emissions
52 associated with products, sometimes misperceived by an order of magnitude or more¹³⁻¹⁶; (2)
53 incomplete understanding of indirect GHG emissions, i.e., those produced by other actors in
54 product supply chains; and (3) difficulties finding or interpreting available information.

55 Policy analyses of climate mitigation initiatives often apply economic cost-benefit
56 analysis to assess feasibility without analyzing the political, social, and behavioral issues that
57 affect the feasibility of and response to these initiatives. This oversight may account for
58 disappointments with the uptake of many initiatives of the past, from nuclear power to time-of-
59 use electricity pricing to carbon taxes. Future mitigation initiatives, such as negative emission
60 technologies, may suffer the same fate if behavioral plasticity and initiative feasibility are
61 considered only narrowly or not at all¹⁷⁻²⁰. These issues may also arise with carbon labels that
62 incorporate carbon offsets, as these suffer from well-known methodological challenges and
63 sometimes rely on unproven technologies that are poorly understood by most citizens and may
64 raise public opposition.

65

66 **Labeling relative to other disclosure initiatives**

67 Like other kinds of environmental and social labeling (e.g., organic, fair trade, and animal
68 welfare), carbon labeling depends on collecting and presenting information in ways intended to
69 shape decisions²¹. The information collected to support carbon labeling of products can also be
70 used to support carbon taxes, carbon border adjustments, and supply chain contracting. Synergies
71 and economies of scale may thus derive from efforts to design carbon disclosure systems with all
72 these uses in mind and from building labeling systems on well-designed disclosure protocols.

73 Environmental labeling (sometimes referred to as eco-labeling) systems vary in the extent
74 to which they signal individual benefits (e.g., financial or health, as with energy and organic
75 labeling) or collective benefits (e.g., societal protection from climate change or wellbeing of
76 ecosystems, as with carbon and sustainability labeling). The benefits signaled by labels likely

77 have heterogenous effects on responders depending on their familiarity and engagement with the
78 labeling system, thereby influencing the effectiveness of labels over time²².

79 Labeling systems also differ in whether they capture environmental footprints from the
80 production of the product (typical of carbon labels), from product use (typical of energy labels),
81 or from the entire product life cycle including production, use, and disposal. Some labels, such as
82 the Greenhouse Gas Protocol's CO₂-Neutral label (<https://www.co2-neutral-label.org/>), also
83 include emissions offsets. The GHG emissions from the use of a company's products, often
84 called scope 3 emissions, the increased policy focus on reporting and reducing emissions
85 elsewhere in product life cycles, and the increased focus on net zero commitments suggest that
86 incentives to label may increase. Labels addressing full product life cycles thus may receive
87 greater emphasis.

88 Important insights may emerge from comparing labeling systems across environmental
89 domains and perhaps also from examining information disclosure initiatives in the health and
90 social domains of products. Nevertheless, we restrict our focus here to carbon footprint labeling.
91 We highlight important dimensions of developing and implementing new carbon labeling
92 systems or modifying existing systems. These dimensions include who develops the systems,
93 how system standards and criteria are negotiated, how and what information is presented, and the
94 heterogeneity of users and their needs. Much of our analysis also applies to energy labels,
95 although energy labels and carbon labels differ (e.g., whether they emphasize individual or
96 collective benefits). For simplicity, we refer to carbon labels unless making a specific distinction
97 between the two.

98 Carbon labeling systems may be sponsored or implemented by governmental, corporate,
99 or nonprofit organizations, or by collaborations of these organizations. They may target

100 consumer or organizational behavior and may influence users anywhere in product life cycles.
101 The validity and effectiveness of carbon labeling systems depend on the characteristics of the
102 targeted product or market; the availability and accuracy of data; the rules developed for
103 converting data into labels; and the procedures employed for developing rules, designing labels,
104 and modifying them as appropriate. The procedures often involve negotiation within and among
105 organizations and can influence trust in the system, which shapes the impact of labels on users'
106 behavior²³⁻²⁵. Wide engagement of government, the private sector, and non-governmental
107 organizations can improve the accuracy and credibility of a labeling system. But labeling also
108 places a premium on technical expertise, and the distribution of power in negotiations has
109 implications for the resulting labeling system^{26,27}. Large organizations, through buying power,
110 can use emissions data to push suppliers to reduce emissions. However, such organizations may
111 also obstruct consensus or shape it toward their interests. These possibilities may affect trust in
112 labeling systems. In general, the dynamics by which labeling systems are adopted and revised
113 within and across organizations are complex and undoubtedly vary across jurisdictions and
114 products²⁸⁻³⁰.

115 Labels may provide information in a variety of formats and at different levels of
116 resolution (see Fig. 1 and Supplementary Table 1). A certificate or seal of approval marks
117 labeled entities as meeting some standard; its absence signifies either failure to meet the standard
118 or to apply for certification. Certificates may attest that a product is carbon neutral, indicate that
119 its footprint is measured and certified (e.g., PAS 2050, ISO14067 standards), that its footprint is
120 being reduced year by year, or that it emits less CO₂ than comparable products^{31,32}. Some labels
121 provide ordinal rating scales analogous to the Michelin star ratings for restaurants or traffic light
122 designations with products labeled as green, yellow, or red. One limitation of such ordinal scales

123 is that there is a tendency for efforts to stop at a point that just meets the criteria for a step on the
124 scale³³. Even finer resolution is offered by quantitative measures, such as fuel economy labels on
125 automobiles or appliances. We argue that the most effective design may incorporate both ordinal
126 and quantitative information to facilitate both simple and more detailed product comparisons
127 (e.g., EU energy label) by diverse consumers (retail, corporate, and governmental) and corporate
128 actors throughout product supply chains^{14,34,35}.

129 Because label users differ in the amount of detail they want or can use, labeling systems
130 should offer a level of detail suited to their needs and capabilities. For example, retail consumers
131 have very little time, energy, capability, or interest in absorbing detailed information when
132 deciding on a can of beans or a lightbulb, so a simple certification or ordinal label may serve
133 them well, presuming it is accurate and credible³⁶⁻³⁹. For larger purchases, such as a vehicle,
134 building, or appliance, retail consumers may use more detailed information, especially if it is
135 presented in a format that facilitates the kinds of comparisons being used in decision making (see
136 Fig. 1). For organizational consumers, retailers, producers and intermediaries in supply chains,
137 and governments, all of which have more at stake and more ability to use detailed information
138 than retail consumers, quantitative information may be critical. The precision of the underlying
139 data and information presented should reflect the function the carbon labeling system is serving
140 because acquiring and analyzing the necessary data can be costly. For products with large carbon
141 footprints, a high degree of precision may be useful to inform choices, but in other instances, less
142 precision may be preferable. A “good enough for the intended purpose” labeling approach may
143 have substantial benefits even as more refined efforts are developed⁴⁰.

144 Although the responses of retail consumers to labels have been the main subject of
145 labeling research, consumers are not the only, or perhaps even the most promising, target for

146 carbon labels. Labeling can reduce GHG emissions without directly affecting retail consumers'
147 choices², including by inducing changes in supply chains, production processes, and product mix
148 to improve companies' reputations or to achieve efficiency gains⁴⁰⁻⁴². Labels may also affect
149 governments, in their roles as regulators, standard setters, and consumers of products. Thus,
150 labels can have effects on organizational behavior beyond those arising from retail consumer
151 behavior. Labels, like other mitigation initiatives, can be assessed in terms of how much effect
152 they could ideally have, the feasibility of their adoption, and the degree to which they produce
153 intended responses when implemented³.

154

155 **Carbon labeling efforts to date**

156 Carbon labeling systems have been developed for a wide variety of products³¹. Ecolabel Index
157 (<http://www.ecolabelindex.com/>) reports 455 ecolabels in 199 countries across 25 different
158 sectors, including 31 carbon footprint labels. Carbon Trust, for example, has labeled hundreds of
159 thousands of products from cement to bank accounts. Some early efforts were undertaken by
160 large European retailers – such as Tesco, Casino, E.Leclerc, and RAISIO – which labeled
161 thousands of products through self-initiated systems^{31,43,44}. However, not all these efforts remain
162 in place. For example, Tesco announced plans to label all of its 70,000 products yet had to
163 abandon the project due to the high associated costs⁴⁵. Casino's carbon label was gradually
164 replaced by a broader environmental index that considers products' life cycle GHG emissions,
165 water consumption, and aquatic pollution. Meanwhile, other actors in the food sector have
166 adopted labeling systems, including restaurants (e.g., Swedish burger chain, Max), food
167 producers (e.g., Unilever), and other corporations. Carbon labeling systems have also been
168 implemented in domains such as tourism, hospitality, transport, and housing⁴⁶⁻⁵⁰.

169 The efforts of Tesco and Casino suggest the importance of avoiding the high cost of
170 attempting to label *all* products, even those with complex carbon footprints and low emissions.
171 Shewmake et al.⁵¹ suggested four criteria for selecting the most promising products for carbon
172 labeling: (1) the amount of GHG emissions, (2) the availability of data on life cycle emissions,
173 (3) the ability of companies to adjust their activities to reduce emissions, and (4) the
174 responsiveness of consumers by switching to lower-carbon products. To this list, we would add
175 (5) the responsiveness of corporations to reputational, efficiency, and other pressure to reduce
176 emissions.

177 Carbon and other environmental disclosure systems have increased market penetration in
178 some domains. For example, environmental and energy certification for commercial buildings
179 (e.g., LEED) in the largest US markets increased from about 5% in 2005 to about 40% in 2014⁵².
180 The Greenhouse Gas Protocol (<https://ghgprotocol.org/>) reports that 92% of Fortune 500
181 companies use the Protocol. Although most corporations report only emissions from their
182 facilities (called scope 1 emissions) and the off-site facilities that provide energy to them (scope
183 2), the Protocol includes a tool for calculating emissions “throughout their value chains” and
184 provides a basis for its CO₂-Neutral label.

185 Carbon labeling, however, remains less widespread than energy labeling. Thanks to the
186 implementation of mandatory energy labeling systems in the European Union, United States, and
187 other areas, labels have long existed for many energy-consuming products and services (e.g.,
188 electric appliances, commercial buildings, housing, motor vehicles). Consequently, retail
189 consumers generally report much greater familiarity with and usage of energy than carbon labels.
190 For example, according to the Special Barometer 492 survey, the EU energy label is recognized
191 by 93% of consumers, and 79% report considering the label when purchasing new electric

192 appliances⁵³. Environmental and carbon labeling are dynamic areas with a great deal of ongoing
193 research, and many labeling systems are underway or in planning. For example, Foundation
194 Earth, a non-profit organization, is currently undertaking a pilot carbon labeling system using
195 traffic light “eco-scores” for food and drinks with a plan for Europe-wide rollout in 2022⁵⁴. The
196 importance of environmental and carbon labeling for informed consumer, corporate, and
197 government procurement decisions is also getting increasing attention at the policy level in, for
198 example, the United Kingdom⁵⁵ and United States^{56,57}.

199 The Internet may also increase opportunities for carbon labeling, and digital carbon
200 labeling may be cheaper, easier, and more effective than labeling for traditional bricks-and-
201 mortar-based commerce⁵⁸. For example, PANGAIA clothing has initiated a “digital passport”
202 (QR code and cloud-hosted digital twin) printed on clothing to indicate its carbon and water
203 footprints, and Sheep Inc uses a bio-based near-field communication tag detailing the carbon
204 footprint at each stage of the supply chain. Other recent advancements, such as block-chain
205 technology, may also improve tools for supply chain management and carbon footprinting⁵⁹.
206 While digital carbon labeling is promising, further research is needed to explore how it can be
207 applied across an array of GHG-intensive production and consumption activities.

208 Retail consumers’ responsiveness to labels may be limited unless enough products are
209 labeled to enable consumers to readily compare among them. Nevertheless, corporations may
210 gain an advantage by displaying a favorable carbon label that suggests to consumers, who are
211 often using cognitive shortcuts, that the labeled product has lower emissions than an unlabeled
212 product. In addition, as we discuss below, even absent major shifts in consumer behavior, the
213 process of gathering and analyzing the data for labeling and the prospect of publicly disclosing
214 product emissions can create corporate incentives for emissions reductions.

215

216 **Evidence of effectiveness**

217 An effective carbon label can be defined as one that decreases GHG emissions in a non-trivial,
218 cost-effective way compared with efforts that lack a labeling feature and that does not negatively
219 affect other mitigation initiatives. Carbon labels can increase behavioral plasticity among retail
220 consumers by encouraging them to select low-carbon products. Carbon labeling can also induce
221 retailers and others in the supply chain (e.g., corporate buyers, transporters, and producers) to
222 provide consumers with low-carbon products because attention to labeling data can make these
223 organizations more aware of GHG emissions and inefficiencies associated with their products or
224 more concerned about naming-and-shaming or reputation campaigns. The effects of labels may
225 vary over time, across types of products, and across types of producers and consumers. We
226 discuss behavioral plasticity for retail consumers and then turn to corporations and other actors.

227

228 **Effectiveness with retail consumers.** Many studies have examined the effectiveness of carbon
229 labels on retail consumer choices⁴⁶ (Box 1 reviews work on vehicle labels; Box 2 examines
230 labeling of buildings and their effectiveness with both retail and organizational consumers). Our
231 broad review of such studies (see Supplementary Information) shows that consumer disposable
232 products have been most extensively studied. Most studies examining consumer responses or
233 behavioral plasticity find a small, positive effect of carbon labels in guiding consumer selection,
234 purchase, or consumption toward lower-carbon products^{14,35,60–65}. However, null effects are not
235 uncommon (see Supplementary Table 3 for summary of major findings over the last 10 years)^{66–}
236 ⁶⁸. For energy labels on household equipment such as electrical appliances or light bulbs, the

237 evidence on behavioral plasticity similarly includes many studies reporting small positive
238 effects⁶⁹⁻⁷¹ with some reporting null effects^{50,67}.

239 Evidence from numerous studies suggests that design features of a carbon label,
240 including image, color, size, and location on product, can significantly influence visual
241 attraction, comprehension, and ultimately engagement with the label^{8,10,14,72}. However, the
242 importance of different design features often varies across product types, decision environments,
243 and the deliberateness of the decision-making process. For example, when consumers make
244 decisions with limited deliberation and in stimulus-intensive environments, such as when grocery
245 shopping, the label must attract visual attention and be easy to understand^{73,74}.

246 For carbon labels on food products, several studies find that certificates (see Fig. 1) are
247 often not very effective in influencing behavior, whereas ordinal (e.g., traffic light) labels are
248 more effective, particularly when coupled with quantitative information^{10,35,75,76}. The observed
249 benefits of traffic light designations are often attributed to their visual attractiveness and
250 especially their ease of understanding and use for product comparisons^{38,48}. A recent systematic
251 review of six studies also found that presenting GHG emissions information using both a logo
252 and text (e.g., a traffic light designation and quantitative information) was the most effective
253 design for influencing consumer choices⁶⁰. Additionally, a recent qualitative study found carbon
254 labels more likely to be noticed when presented as a warning of an environmental hazard⁷², a
255 finding consistent with evidence from health labeling^{77,78}. Finally, studies on the EU energy label
256 indicate that shifting from the original A-G ordinal ranking to a A⁺⁺⁺-D ranking reduced its
257 effectiveness among retail consumers by lowering the perceived importance of energy efficiency
258 in product choices^{79,80}. Consequently, the original A-G ranking was recently reinstated alongside
259 greater energy efficiency expectations for each ranking level.

260 Although research to date supports the promise of labeling, the literature has several
261 noteworthy limitations. Perhaps the most important is that the vast majority of studies have been
262 conducted in artificial settings using hypothetical choice experiments^{10,35,60,69,73}, small-scale field
263 experiments (e.g., in one canteen or restaurant^{55,56}), or cross-sectional surveys^{8,81,82}. The
264 generalizability of such evidence remains uncertain and estimated effects may not match real-
265 world outcomes. Moreover, studies typically focus on a particular product (e.g., coffee,
266 tomatoes, light bulbs, washing machines) or product category (e.g., meat, dairy products, home
267 appliances, building materials), which permits assessing within-product (category) effects but not
268 substitution and spillover effects. Another important limitation is that most studies have
269 evaluated labeling effects as self-reported willingness to pay, purchase intention, noticeability or
270 visual attention, and preference for label designs^{10,64,72,73,83}. Limited evidence is available for
271 assessing the effects of carbon and energy labeling on actual purchasing and consumption
272 behavior for products with high technical potential to reduce emissions (e.g., air travel), perhaps
273 due to the difficulty of accessing actual sales data. Online purchasing may provide opportunities
274 for measurement of actual purchasing behavior and for experimentation with label design and
275 consumer targeting⁵⁸. Finally, the literature has examined how different labeling approaches
276 might appeal to different market segments. This includes the differing effect on consumer
277 segments of communicating individual versus collective benefits²², which plays a prominent role
278 in the psychology of environmental decision making⁸⁴.

279 Taken together, available evidence finds some effects of carbon and energy labels on
280 retail consumer purchases, over and above the effects of other initiatives. However, these effects
281 are likely context- and actor-dependent. For example, effects may vary with the perceived
282 importance of non-environmental product attributes, socioeconomic factors, political views,

283 environmental concern, business domain, presence of competing labels, or prevalence of norms
284 about purchases that might be signaled by labels. Information provision has been found effective
285 in influencing the selection phase of decision making, after a consumer has decided to choose
286 among particular products, and when the information source is highly credible to the consumer¹².

287

288 **Effectiveness with other life cycle actors.** Relatively little research has focused on the impact
289 of carbon labeling on the carbon footprint of retailers, producers, intermediaries, and wholesale
290 consumers. Research has not yet systematically examined such effects, although some evidence
291 from studies of other types of environmental labeling^{29,42,85} and of corporate social responsibility
292 indexes suggests that labeling can be effective in shifting corporate behavior even when
293 consumer effects are modest^{86,87}. Indeed, some types of environmental disclosures at the
294 corporate level can have an effect on stock prices, and thus provide a powerful incentive⁴⁰.

295 One possible influence pathway involves making producers or intermediaries more aware
296 of GHG-intensive inputs (i.e., fossil fuel energy, fertilizers) that are being managed inefficiently.
297 Thus, the mere assessment of GHG emissions from a product may draw attention to potential
298 cost savings from reducing inefficiencies in product life cycles. Although many businesses have
299 adopted carbon accounting, tracking indirect GHG emissions from the full life cycle of their
300 products and services has lagged and remains a challenge to organizational carbon
301 accounting^{88,89}. A study of 63 large Brazilian companies found that implementation of an
302 environmental management system was significantly related to reductions in GHG emissions,
303 suggesting that tracking and analyzing resource use can lead to emission reductions⁹⁰. In
304 addition, Li et al.⁹¹ found that for the top 100 listed companies (2008-2012) in China,
305 environmental management systems were positively correlated with corporate green innovation.

306 Research remains scarce on whether the implementation of carbon information systems in
307 particular leads to similar improvements in GHG emissions.

308 Labeling also may induce some producers to reduce emissions in order to score well in
309 labeling systems and gain reputational benefits. Evidence shows that corporate reputation affects
310 profits^{92,93}. Lee et al.⁹⁴ report that supply chain managers identified “risk of brand damage” as
311 the primary motivation for measuring and addressing supply chain social and environmental
312 impacts. Although research is lacking, a reasonable hypothesis is that reputational risk might
313 drive product innovation and GHG intensity reduction. Darnall and Aragón-Correra⁴² suggest
314 that reputational risk is what drove firms to reduce trans fats in food before nutrition labeling was
315 required. Similarly, corporations in the United States reduced their toxic chemical releases when
316 they were first required to publicly disclose emissions through the Toxic Release Inventory even
317 though such reductions were not legally mandated⁹⁵.

318 Carbon accounting in support of labeling systems can also increase corporate motivations
319 to require GHG emissions data and reductions from suppliers. Drawing on the experiences of
320 Carbon Trust labeling efforts, van der Ven et al.⁹⁶ identify benefits from carbon labeling arising
321 from scaling (e.g., widespread global uptake of carbon assessment methodologies) and
322 entrenchment (e.g., identification of efficiencies in corporate supply chains). Carbon labeling and
323 supply chain contracting thus can be mutually reinforcing. Supply chain contracting
324 requirements can increase the ability of corporate buyers to obtain emissions information from
325 suppliers. In turn, the information gathered from supply chains to support carbon labeling
326 systems can bolster the motivations and ability of corporate buyers to press their suppliers to
327 reduce their carbon footprints.

328 Carbon labeling may also signal what will be required under future regulations and how
329 future regulations will affect product lines. For instance, in the United States, Energy Star
330 certification is usually set to identify the top 25% of energy performing products, but it is
331 expected that many current Energy Star standards will become future mandatory minimum
332 standards for all products⁹⁷. A label that discloses high GHG emissions also may indicate a
333 corporation's vulnerability if governments adopt climate regulations, carbon taxes, or border
334 adjustments or if corporate buyers include carbon requirements in supply chain contracts. The
335 information generated by labels also may facilitate the adoption of these types of public and
336 private climate governance requirements, signal the likelihood of future requirements, and lay
337 the groundwork for meeting the requirements.

338 Overall, carbon labeling systems provide data that can help corporations meet the
339 growing demand for attention to environmental, social, and governance (ESG) goals. Moreover,
340 the public nature of labeling systems allows corporations to signal their movement towards
341 achieving these goals. We thus expect substantial synergies between labeling, pressure for supply
342 chain and other scope 3 emissions reductions, ESG pressure from investors, and other processes
343 that are encouraging broader consideration of lifecycle GHG emissions in corporate decision
344 making.

345

346 **Challenges and paths forward**

347 The most fundamental challenges to wider use of carbon labeling arise from an incomplete
348 understanding of labeling systems, competing objectives for these systems, and the tendency to
349 look for panaceas. The focus of research on retail consumers suggests that public and private
350 entities creating labeling systems may assume that they are only valuable if they affect retail

351 consumer behavior when the effects on corporate and government behavior may be equally or
352 more important. Public and private policymakers might presume tradeoffs between labeling and
353 other policy initiatives, but there might be synergies^{98–101}. Labeling systems generate information
354 about product-specific GHG emissions that can be used by corporations and governments to
355 support supply chain requirements and by governments to develop climate mitigation measures
356 such as border adjustments¹⁰².

357 The competing objectives of the producers and distributors of products create other
358 challenges. Many corporations' profits are greatest for products with the largest carbon
359 footprints, so these actors may be resistant to labeling. For example, the profits from an auto sale
360 may be larger for fuel-intensive rather than fuel-efficient vehicles¹⁰³. Such motives may also
361 prompt industry efforts to weaken labeling systems by making it too easy for products to look
362 environmentally friendly or by allowing for exceptions and evasion of accountability through
363 offshoring production or other means. The interplay between governments, corporations, and
364 non-governmental organizations is complex. In their study of environmental labeling, Darnall et
365 al.²⁸ find that independently sponsored environmental labels have the strongest rules while
366 privately sponsored labels have the weakest. Bullock²⁶ demonstrates that the private sector can
367 be more powerful than the public sector in label standard-setting. Some have suggested that the
368 dynamics of labeling are driven by competition across sectors¹⁰⁴, first movers¹⁰⁵, or the scope of
369 what is encompassed in labeling^{85,106}.

370 Carbon labeling can be easily overlooked by public and private policymakers who do not
371 account for the difficulties of adopting and implementing other climate mitigation initiatives or
372 who seek panaceas. Although labeling systems can reduce GHG emissions and complement
373 other climate initiatives, they are certainly not sufficient to achieve emissions reduction targets

374 on their own. But labeling may be more feasible because it may be seen as less restrictive or as
375 allowing more time to push product life cycles towards reduced emissions. Labeling can also be
376 implemented by the private sector where governments lack the political support to adopt
377 regulatory measures and can have effects that transcend national boundaries even absent
378 international agreements. The barriers to labeling may thus be weaker than the barriers to direct
379 government product regulation or carbon pricing. Labeling may also facilitate later government
380 adoption of these approaches. In evaluating mitigation initiatives, it is important to recognize that
381 a somewhat effective label will have greater impact than a stronger policy that is never adopted
382 or adopted at a much later date. The desire for mitigation panaceas should not block real progress
383 in reducing emissions.

384 Greater emphasis is needed on interactions between labeling and other mitigation
385 initiatives. Valid and credible quantification, whether or not included on labels, can support
386 efforts to combat greenwashing¹⁰⁷ by providing a metric to evaluate companies' climate claims.
387 It can also inform corporations' efforts to use procurement policies to reduce suppliers' GHG
388 emissions^{108,109} and make it easier for suppliers to demonstrate compliance with those policies.
389 Detailed quantification will require disclosure of information that allows comparisons across
390 product categories by sophisticated consumers and facilitates development of supply chain
391 requirements. Such quantification may be limited by lack of data or access to proprietary data.
392 But although the data used to develop labels should be accurate enough to support informed
393 choices, it need not always be precise. The tradeoff between accuracy at higher cost and
394 imprecision at lower cost needs to be assessed based on how the accuracy, precision, and cost
395 tradeoffs influence the actions of consumers, producers, and other supply chain actors. Data

396 development and label design efforts should also prioritize products with GHG-intensive supply
397 chains⁵¹.

398 Because a substantial portion of GHG emissions are embedded in international trade,
399 border adjustments are under active discussion in many countries, including in the European
400 Union where a border-adjustment scheme was recently adopted by the European
401 Commission^{110,111}. The information generated for carbon labeling may facilitate the
402 development, implementation, and defense of border adjustments¹¹². For instance, an economy-
403 wide labeling system could produce information that would permit more accurate assessment of
404 product-related GHG emissions for purposes of expanding border adjustments from energy-
405 intensive sectors to other sectors. A labeling system that is tied to an eventual border adjustment
406 scheme also could improve the chances that the latter would be found to be nondiscriminatory by
407 the World Trade Organization¹⁰².

408 Challenges for labeling systems arise in meeting data needs, developing protocols for
409 converting data into labels, and creating effective and trustworthy procedures for developing
410 labeling rules, and designing and modifying labels. Effort is required to keep the processes used
411 to develop labeling systems balanced¹¹³ between public and private interests¹¹³. To make labeling
412 systems widely credible and effective, decision processes should ideally engage the full range of
413 interested and affected parties, public and private¹¹⁴, across product life cycles from materials
414 extractors to final consumers and waste disposers. In practice, however, a search for full
415 engagement can impede incremental improvements on available information and can delay the
416 implementation of carbon labeling systems, so a balance between engagement and practicality is
417 needed. Procedures for making rules should consider the fact that deliberations about complex
418 technical issues tend to favor actors that have the resources for sustained involvement in the label

419 development process. Still, credible labeling systems need to account for the concerns of retail
420 consumers, small producers, intermediaries, and other actors who might be adversely affected by
421 labels. Given these challenges and the urgent need for action, we conclude that labeling systems
422 should be developed and modified incrementally through a learning process in which each round
423 of implementation is viewed as an experiment that can inform future improvements via social
424 learning¹¹⁵. Ongoing programs, such as PAS 2050¹¹⁶, can serve as natural experiments that will
425 allow understanding of how labeling influences the actions of consumers, producers, and other
426 supply chain actors.

427 In 2011, Vandenberg et al.² argued that it was time to try carbon labeling. That is
428 happening: private and government-implemented carbon and energy-labeling systems have
429 served as quiet but important components of climate mitigation strategies over the last decade.
430 The importance of these labeling systems has only increased with the urgency of the climate
431 threat and the difficulty of mobilizing adequate governmental responses.

432 Vandenberg et al.² also argued for a shift in research emphasis from retail consumer
433 behavior to corporate behavior. This shift has not happened. Over the past decade, except for
434 research on buildings, labeling studies have focused almost exclusively on consumer behavior.
435 As noted, most of these studies are limited by the difficulty of studying actual consumer
436 behavior. Nevertheless, a large body of research now suggests that labels have some of the
437 desired effects on retail consumers, identifies some effective label attributes, provides increasing
438 support for the efficacy of ordinal (e.g., traffic light) labels, and supports a conclusion that
439 labels' effects depend on context.

440 Available research on corporate behavior, including responses to carbon labeling and
441 other environmental disclosures, suggests the potential for substantial impacts²⁶ from carbon

442 labeling and the need to prioritize corporate responsiveness in future work. The effects of carbon
443 labeling systems depend on more than retail consumer-facing labels. They rest on GHG
444 emissions data, which can inform choices by organizational suppliers and consumers as well as
445 retail consumers and can support other public and private mitigation measures such as carbon
446 taxes, border adjustments, and supply chain contracting requirements. Although the motivations
447 for corporations and other organizations to develop and respond to carbon labels have only
448 received limited attention, the available research suggests that the information generated and
449 disclosed in the labeling process may enable organizations to identify inefficiencies or induce
450 them to reduce the carbon footprints of their products because of brand or reputational concerns.
451 Quantitative emissions data may be of great value for these purposes, but more needs to be
452 known about corporations' responses to labeling and about the types of labels that may induce
453 corporations to change the products offered to retail consumers even if consumer responsiveness
454 is limited.

455 Available research suggests that a prudent near-term strategy is for carbon labeling
456 systems to focus on the most promising products, not all products, and to use labels that include
457 both ordinal and quantitative information. Adding quantitative information to a label can often be
458 done without undermining the simplicity and clarity of the ordinal rating (see Fig. 1, ordinal +
459 quantitative), and labels with these two features may increase the chance of driving
460 organizational as well as consumer behavior while the research gap on organizational behavior is
461 being filled. Useful insights may be drawn from comparative analyses that look at carbon
462 labeling across products and across countries and from research on other forms of labeling, such
463 as social justice or health labeling.

464 In short, the case made a decade ago by Vandenberg et al.² for expanding carbon
465 labeling is even stronger today as the risks arising from climate change and the barriers to
466 comprehensive governmental action have become clearer. Carbon labeling is not a panacea, but
467 the search for panaceas should not distract from interim initiatives that can reduce emissions
468 promptly and complement more comprehensive climate mitigation measures as they become
469 feasible.

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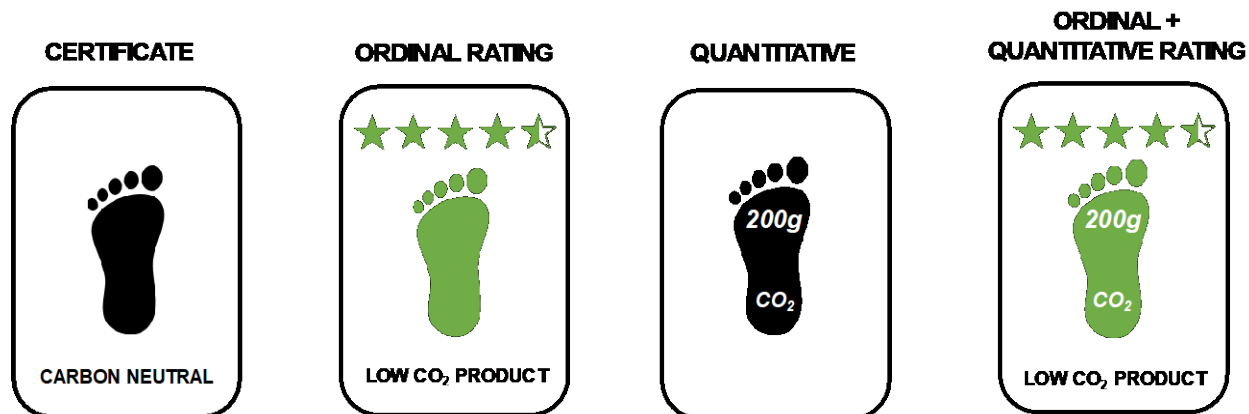
817 **Competing interests**

818 The authors declare no competing interests.

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820 **Author contributions**

821 All authors contributed significantly to conceptualizing the research and to writing the
822 manuscript.



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Fig. 1. Illustrative examples of levels of resolution offered by carbon labels. Labels at all these levels of resolution are currently in use. Some examples are identified, with links, in Supplementary Table 1. Certificate labels indicate that labeled products meet some standard; ordinal ratings differentiate among several levels of carbon footprints of the same product; quantitative labels offer numerical measurements of carbon footprints; and some labels combine quantitative and ordinal ratings. The design of labels should be informed by research on what means of conveying information is most effective, particularly for retail consumers. Available data are inadequate to choose among logo types (we use footprints here) or among ways of representing ordinal differences (e.g., stars, letter grades). Research suggests that ordinal labels that employ the familiar red-yellow-green distinction in traffic lights may be effective for many retail choices³⁵. In the figure, we applied that insight by coloring the footprints green in the ordinal representations to indicate low-footprint products. We would have used yellow or red to indicate intermediate or high-footprint products. Icons Roselin Christina.S from Nounproject.com.

Box 1 | Responses to labels for motor vehicles

The choice of motor vehicles is one of the most climate consequential decisions for households and many organizations. It is also a complex decision, involving a relatively large financial commitment (among households, usually second only to the purchase of a home), a complex variety of practical and symbolic features of the vehicle, and efforts by the industry to shape decisions¹¹⁷. For many retail consumers, carbon or energy labels are not likely to be the dominant influence on a motor vehicle purchase decision. Nonetheless, the rise in popularity of hybrid and all-electric vehicles through a period of historically modest gasoline prices suggests that environmental impacts, including climate change concerns, do have substantial impact on vehicle purchases. Certainly, the stark contrasts among the carbon footprints of all-electric, hybrid, and conventional vehicles suggests that information on labels reflects something that matters to many retail consumers. But beyond that categorical distinction, do labels matter?

In many countries fuel efficiency labels on new vehicles are mandated. Since fuel efficiency translates rather directly into GHG emissions, these labels are a reasonable surrogate for carbon labels as an influence on vehicle purchases. Indeed, one could view carbon labels and fuel efficiency labels on vehicles as alternative ways of presenting essentially the same information to consumers, although fuel efficiency labels signal both individual and collective benefits, while carbon labels mainly signal collective benefits. Of course, with plug-in hybrid or all-electric vehicles the GHG emissions depend on the source of electricity.

Several studies document the effects of vehicle labels on retail consumer choice. Much of this literature relies on self-reports of behavioral intentions, so the usual cautions apply. It does seem clear that the way information is presented makes a difference. For example, Brazil et al.¹¹⁸ find that information presented as monthly fuel cost has a larger impact on stated preferences than information presented as fuel consumption. In a direct comparison of fuel efficiency and cost information with environmental impact information, Codagnone et al.¹¹⁹ found fuel efficiency labeling had the greatest impact (see also ref¹²⁰). Galarraga et al.¹²¹ found that both relative (compared to other vehicles) and absolute ratings of fuel efficiency can matter, but which matters depends on whether consumers are making choices within a class of vehicles (e.g., sedans) or across all classes, an indication of the complexities that have to be considered in designing effective labeling strategies (see also ref¹²²). A variety of other studies find that labels can have an impact on willingness to spend more for a fuel-efficient vehicle but, again, the results are complex, with the effect of energy efficiency or carbon labels depending on factors such as the kind of benefits from low fuel consumption that were signaled^{123,124}. The effects on manufacturers and dealers have been less studied; some reports show that dealers steer retail customers away from electric vehicles¹⁰³, and this may suggest the need for research and policy initiatives that focus on these actors.

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Box 2 | Responses to building labels

The purchase, lease, or rental of a dwelling is the largest item in the budget of most households. The costs of buildings also represent an important expenditure for most organizations. It is therefore not surprising that building energy ratings and labels have a considerable history. Many jurisdictions have mandates for labels or rating and voluntary systems are also used extensively. As with the work on vehicles discussed in Box 1, this literature has evolved independently of the work on low-footprint consumer products that is the major focus of this section. Experiments with hypothetical real estate ads have suggested that energy ratings could influence home purchase decisions, although as with all results about labels, the impacts may vary across segments of the population¹²⁵. There is also evidence that energy efficient homes and homes equipped with solar photovoltaics appraise and sell for higher prices, so labels may facilitate signaling these features of a home, at least in the places where they have been studied most, such as California¹²⁶.

For commercial buildings, it appears that environmental certification (which includes energy efficiency but other factors as well) leads to increased rental prices, lower vacancy rates, greater occupant satisfaction^{52,127}, and decreased energy use¹²⁸. As with much of the literature on labeling, experiments that allow detailed assessments of the impact of a label mainly rely on hypothetical responses. Experiments using data from actual purchases or rentals assessing the impacts of a labeling or certification scheme over and above the features of the building itself are methodologically challenging. But we suggest that a labeling system may draw attention to and encourage improvements in building characteristics that might not otherwise be visible. For buildings as for vehicles, the most effective strategies for increasing the impact of labels may come from targeting key actors who influence consumer and producer decisions. For buildings, these include real estate agents, appraisers, corporate tenants, and mortgage lenders¹²⁹.