

NZ-ECs Claims Guidance

Disclaimer: This guidance supports organisations seeking to make credible, transparent claims related to the use of New Zealand Energy Certificates (NZ-ECs) through the New Zealand Energy Certificate System (NZECS) operated by BraveTrace. It does not constitute legal advice. Organisations remain responsible for ensuring that all public claims align with New Zealand consumer law, Commerce Commission guidance on environmental claims, and the most up-to-date requirements of relevant international reporting frameworks.

The New Zealand [Commerce Commission](#), which enforces the [Fair Trading Act 1986](#) (FTA), has published [Environmental Claims Guidelines](#) often referred to as New Zealand's Green Claims Code. The guidelines clearly outline how businesses must tell the truth, be specific, be able to substantiate claims, use plain language, and avoid exaggerating when it comes to green marketing. These guidelines are also intended to act as a reference point for businesses before any product or service enters the market. To make it easier in practice, BraveTrace has developed this Claims Guidance that explains how the New Zealand Green Claims Code applies specifically to New Zealand Energy Certificates (NZ-ECs):

1. Be truthful and accurate

Electricity supplied through the New Zealand grid comes from a mix of renewable and fossil fuel sources. Because of the physical nature of electricity, you cannot claim to be *using* renewable electricity unless you are 100% powered by your own behind-the-meter renewable generation (e.g. solar panels directly connected to your consumption). Best practice is to frame claims around *supporting renewable generation* or *matching consumption with renewable generation* through the purchase of NZ-ECs. **Example Claim:** "We support renewable generation in Aotearoa by matching 100% of our electricity consumption with renewable generation tracked and verified by BraveTrace."

2. Be specific

Avoid blanket statements like "We support New Zealand's clean future". Instead, clearly state what specific action you've taken and how. **Example Claim:** "Through the purchase of BraveTrace NZ-ECs, we support the [ABC] wind farm generation." or "Through the purchase of BraveTrace NZ-ECs, we support the [ABC] decarbonisation fund."

3. Be able to substantiate your claims

You must have reasonable grounds for a claim when you make it. BraveTrace provides detailed reporting (statements of position and redemption receipts) to support your claims with verifiable, traceable and reliable information. **Example Claim:** "As per BraveTrace's verification report, we purchased and redeemed X NZ-ECs from generation between 1 April 2024 and 31 March 2025, fully matching our electricity use for the same period on an [annual/quarterly/monthly] basis."

4. Use plain language

Claims should be easy to understand for a general audience. **Example Claim:** "We purchased X NZ-ECs to match 100% of our electricity consumption with renewable generation verified by BraveTrace."

5. Do not exaggerate

Do not overstate or imply a greater environmental benefit than what your actions deliver. **Example Claim:** "We purchased X MWh of renewable energy certificates (NZ-ECs) to match the electricity consumption of our Christchurch and Wellington offices." or "Our purchase of NZ-ECs supported the development of X kW of solar in [ABC] Regional Community."

For more information, visit: www.bravetrace.co.nz or email: contact@bravetrace.co.nz