

Substantiating green claims

POSITION PAPER

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Providing information on the environmental footprint of food and drink products will help consumers choose more environmentally sustainable products.

The European food and drink industry supports the development of an EU-harmonised legislative framework on green claims, which should set minimum requirements for the voluntary provision of product environmental information. Making and substantiating green claims in a verifiable, easy-to-understand, and comparable way across the EU will facilitate a level playing field among companies in the Single Market and encourage more sustainable production and consumption.

More and more, consumers are aware of the environmental impact of the products they buy, use, and consume and the demand to purchase greener products is growing. This is why food and drink manufacturers in Europe are continuously improving the environmental footprint of their products and providing clear environmental information to consumers.

INTERESTING FACTS

The large number of environmental labels and claims active today can confuse consumers and complicate industry efforts to make greener products.

>230 >450 >80

environmental labels active in the EU

environmental labels active worldwide

widely-used reporting methods for CO2 emissions only

WHY SHOULD THE EU REGULATE GREEN CLAIMS?

- Clearer consumer choices
- Clearer sourcing choices along the food chain
- No misleading claims or greenwashing
- Increased business and consumer trust
- Level-playing field for market operators across the EU
- SME-friendly system
- Evidence-based green claims
- Smoother transition to more sustainable food systems
- Easier monitoring of product environmental footprint

As part of the 2020 Circular Economy Action Plan, the European Union will establish new rules to require companies to substantiate the green claims on their products against an EU standard – the so-called Product Environmental Footprint methodology (PEF).

FoodDrinkEurope recommends some essential steps on how to substantiate green claims and avoid greenwashing that any new legislation should consider.

Keep SMEs on board

SMEs represent 99% of the food and drink manufacturing industry in the EU. Involving them in the green transition from the onset is a key to success. To ensure that food and drink SMEs are supported in their efforts to improve the environmental footprint of their products, the European Commission should:

Thoroughly assess the **COST-EFFECTIVENESS AND IMPLICATIONS** of any proposed legislation affecting SMEs

SIMPLIFY THE METHODOLOGIES to calculate the environmental footprint of products

Ensure better **ACCESS TO ACCURATE DATA** for SMEs to calculate the environmental footprint of products

Essential recommendations for legislative proposals on green claims

- 1** **Focus any legislation on the environmental footprint** and clearly differentiate between environmental footprint claims and environmental footprint labelling schemes.
- 2** **Align EU methodologies and requirements on claims at business level**, especially those relating to climate neutrality, with international scientifically recognised standards, (e.g. RED, ISO 14040/14044/14021, UK PAS 2050/2060, GHG protocol).
- 3** **Ensure that the safe use of approved food ingredients** (e.g., enzymes) is not an obstacle to making a green claim.
- 4** **Allow several LCA methods for substantiating environmental footprint claims.** The private sector and sub-sectors of products covered should be closely involved in the development of PEF category rules as well as methodology and communication rules to allow comparison within and across product groups.
- 5** **In the absence of PEF category rules, allow food, beverage, and pet food manufacturers to make comparative claims in the form of an aggregate eco-score.** Requiring PEF category rules for eco-scores would block the sector's ability to influence consumer choice towards more sustainable solutions, given the length and cost of developing such rules.
- 6** **A yearly audit of systems and processes against the requirements of the law should take place through** third-party certification to ensure accountability and ensure trust among economic operators and consumers.
- 7** **Provide specific support for SMEs, especially on the development and application of PEF category rules.** While the use of environment footprint claims and labelling schemes should remain voluntary, companies should have access to a database needed to make PEF calculations free of charge.
- 8** **Develop specific guidelines for the food, beverage, and pet food sectors to help companies identify environmental impact indicators without the need to conduct a full environmental impact assessment.** Looking at existing food PEF category rules, climate change, land use and water use are identified as the most relevant impact indicators. Such a streamlined approach will also help bring SMEs on board.
- 9** **Consider alternative communication channels for providing food environmental information to consumers**, like digital labelling, so as not to jeopardise the provision of other key consumer information that must remain on-pack, such as ingredients or allergen information. Digitalisation should be promoted when it comes to data collection and verification.
- 10** **Avoid further delays to the publication of the proposal.** Harmonisation will help mitigate the divergence among eco-scores and will help establish common expectations along the value chain. For this purpose, a Regulation would be most effective.

ABOUT FOODDRINKEUROPE

FoodDrinkEurope represents the food and drink manufacturing industry. Made up of 291,000 businesses - 99% of which are SMEs - and 4.8 million employees, the food and drink industry is Europe's largest manufacturing industry.

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