

# 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 the policy scope on **voluntary environmental footprint communications based on the PEF methodology**. Other voluntary sustainability communications can be substantiated by recognised international standards (i.e. packaging, food waste, biodiversity).
- 2** Ensure a thorough impact assessment of the proposed requirements on the **long-term competitiveness of the European food and drink sector**. Future legislation should not necessitate an unreasonable use of resources for enterprises, especially SMEs, and it should provide legal certainty.
- 3** Cooperate with providers to develop solutions to provide **substantiated claims that are easily and swiftly applicable in the market**. The private sector should be involved in the assessment of the impact of future measures as well as in the development of future PEF category rules and related pilot projects.
- 4** Set up a system by which green claims can be verified **ex-post, through third-party certification**. This will ensure accountability and will increase trust, both among economic operators along the supply chain and among consumers.
- 5** Simplify the tools to calculate the **life-cycle environmental footprint of food and drink products**, based on the EU PEF methodology.
- 6** In the absence of PEF category rules, allow food, beverage and pet food manufacturers to substantiate their claims based on the **PEF methodology**, until more category-specific PEF methodologies are available.
- 7** Develop specific guidelines for the **food, beverage and pet food sectors** to help companies identify the environmental impact indicators and indicate how to compare products not covered by specific PEF category rules.
- 8** 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 on the list of ingredients or allergen information.

### 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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