

IMACE POSITION ON ENVIRONMENTAL PERFORMANCE OF PRODUCTS & BUSINESSES – SUBSTANTIATING CLAIMS

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IMACE welcomes the European Commission’s work on substantiating green claims. We acknowledge the need to ensure a clear, consistent and reliable method to support environmental claims on products, so as to empower consumers to make conscious choices and enable the ‘green transition’.

Green claims, expressed through labelling, can be an effective tool to educate and inform consumers about the environmental impact of a product. Labelling can play a substantial role in **educating and guiding consumer choice**.

The current landscape of environmental labels looks diverse and fragmented. Not only are they based on different methods that confuse consumers, but their use can also be misleading or subject to abusive marketing practices. IMACE therefore strongly supports a common methodology to substantiate green claims.

In this regard, the Product Environmental Footprint (PEF) and Product Environmental Footprint Category Rules (PEFCR) allow to identify hotspots and weaknesses in a product’s production process, helping food producers to understand where to act. However, **the PEF and PEFCR, as they currently stand, need to be adapted to be fully fit for purpose**, i.e. empower consumers to grasp the environmental impact of food products.

The following adaptations are particularly needed:

- **Comparability based on products’ functionality.** The European Commission clearly states that ‘the scope of a PEFCR should be based on a function-based approach’ since ‘meaningful comparisons can only be made when products are capable of fulfilling the same function’¹. For instance, a plant-based margarine/spread and a dairy butter or dairy spread should be assessed within the same category. This is because consumers make their consumption choices by comparing ‘interchangeable’ products, that they can use or consume in a similar way and that represent **the alternative offers within the same functional category** (e.g. spreadable fats²). Yet, current pilot PEFCR categorises foods based on their ingredients and composition (e.g. dairy products). That makes it impossible to compare the environmental performance of butter and margarine. The limited scope of the current food PEFCRs risks undermining the

¹ Product Environmental Footprint Category Rules Guidance, May 2018, page 28
https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR_guidance_v6.3.pdf

² Annex VII, Appendix II of Commission Regulation 1308/2013 establishing a common organisation of the markets in agricultural products,
<https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2013:347:0671:0854:EN:PDF>

effectiveness and usefulness of the method³. They also contradict **PEFCR for (non-) food products** which categorises products according to their functionalities: For instance, the PEFCR for ‘hot and cold-water supply plastic piping systems’ groups products based on the equal function they perform, allowing for different compositions of plastics. This approach compares replaceable alternatives for consumers, across a range of materials. Therefore, if a harmonised approach to environmental claims relies on the current food PEFCRs, consumers will likely be misled.

- **Focus on the most meaningful environmental factors.** Green claims and environmental labelling should pick out the environmental factors which are the most impactful, and the easiest for consumers to understand. As such, the priority should be climate impact / CO₂-eq emissions. Other priority environmental impacts should be freshwater consumption and land occupation. These are both impactful and widely understood by consumers.
- **Clear communication to consumers.** Consumer communication is pivotal to ensure the effectiveness of environmental claims. If we are to convey the true environmental impact of food products belonging to the same functional category, **absolute numerical values** (e.g. carbon declaration, absolute GHG emission values) prove to be the best format to allow comparison. The absolute value approach is expressed through kg CO₂-eq emissions per kg of food, mirroring the method used to present the nutritional composition of foods (g of nutrient/100 g of food). IMACE is in favour of aligning the reference values with that of nutritional declarations, bringing them all to 100g / 100ml of product.

Alongside the above-mentioned points, an effective methodology should also include the following elements:

- **Evidence-based.** The methodology should rely on solid criteria and validated information derived from verified (scientific) research and tracing mechanisms;
- **Transparency.** The methodology should be as clear as possible, allowing consumers to understand the rationale behind the claims. It should rely on existing international standards which are used in assessing the environmental lifecycle of products⁴;
- **Feasibility and simplicity.** The method should be feasible for the producer, allowing food business operators to rely on the data and information on the environmental impact of the ingredients – in the case of margarine, vegetable oils – provided by their suppliers;
- **Voluntary nature.** The methodology should be voluntary, providing all food business operators – especially start-ups and SMEs – the proper amount of time to adapt;

³ Product Environmental Footprint Category Rules Guidance, May 2018, page 28
https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR_guidance_v6.3.pdf

⁴ The [ISO 14040:2006 Environmental management — Life cycle assessment — Principles and framework](#) defines a “comparative assertion” as an “environmental claim regarding the superiority or equivalence of one product versus a competing product that performs the same function”, stating that competing products should be assessed based on their functionality.

- **Innovation-driven.** The method should encourage producers to improve the sustainability of their production chain and being able to communicate it to consumers;
- **Coexistence with other labels.** The new methodology should harmonise environmental claims while leaving the opportunity to use currently recognised and trusted labels that relate to, for instance, sustainable sourcing, such as RSPO logo on sustainable palm oil;
- **Availability at point of sales.** For consumers to feel empowered to make sustainable purchasing decisions in an unbiased way, clear and reliable information on the environmental impact of the product should be available at point of sales.

IMACE therefore supports a harmonized method that is able to provide consumers with the information they need to make day-to-day consumption choices and opt for more sustainable food products. Such methodology could be based on PEF and PEFCR, provided that some necessary adaptations are integrated, mainly related to products' comparability according to a function-based approach; a clear focus on few, meaningful impacts prioritising climate impact and GHG emissions; and a clear consumer communication facilitating comparison, such as via the use of absolute numerical values.