



European Food SCP Round Table: Working Group 1

Working paper: Product Category Rules: needs, the role of the Protocol, and Round Table governance

Target audience: European Food SCP Round Table Steering Committee

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Summary

The Food SCP Round Table should coordinate the development of product category rules (PCRs) for food and drink related products. These would need to be in-line with the ENVIFOOD Protocol. To also meet emerging Product Environmental Footprint (PEF) Guide requirements from the European Commission, these could equally be in-line with the more general provisions of the PEF Guide and could be developed following guidance from the European Commission for the development of Product Environmental Footprint Category Rules (PEFCRs). Equally, the ENVIFOOD Protocol could be periodically reviewed to e.g. include updates and additional general provisions that are found to be needed at the sectorial level.

Overview

In the context of the mandate of the Food SCP Round Table, this document highlights the needs of business and the role of the Round Table in relation to product category¹ specific guidance documents for food and drink products.

This briefing document takes into account the voluntary principles established by the Round Table members and the associated ENVIFOOD Protocol. Recommendations account for recent developments such as the European Commission's EC recommendations in relation to Product Environmental Footprint (PEF) Guide and foreseen pilot testing for the development of PEF Category Rules (PEFCRs).

1. Introduction

The European food chain shares the responsibility of ensuring that production and consumption of food and drinks, including products sourced from outside the EU, not only meet consumers' needs for food safety, nutrition, health, affordability, product choice and contribute to the generation of economic

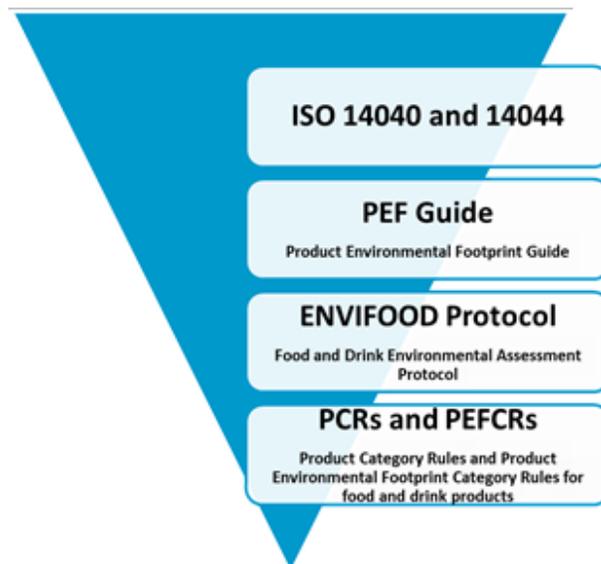
¹ As defined in section 4 of Food SCP RT (2013), ENVIFOOD Protocol, Environmental Assessment of Food and Drink Protocol. European Food Sustainable Consumption and Production Round Table (SCP RT), Working Group 1, Brussels, Belgium

growth, but that they are also environmentally sustainable, respecting the Earth's eco-systems' capacity over the long term.²

The objective of the Food SCP Round Table (RT) is to establish the European food chain as a major contributor towards sustainable consumption and production in Europe. The European Food SCP Round Table's activities will not only help to strengthen the long-term competitiveness of Europe's food chain, but also support EU policy objectives, notably those outlined in the EC's Action Plan on Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy³. The RT is also taking into account the global SCP agenda, including the initiatives facilitated by UNEP and other organisations to advance resource efficiency, sustainable value chains and social responsibility.

With this aim, the European Sustainable Consumption and Production Food Round Table (RT) has established a set of Principles (reference) and the ENVIFOOD Protocol. The voluntary principles represent the collectively-agreed position of the FRT to derive efficient and correct environmental assessment and communication for food and drink products. Building on these principles, the Protocol provides practical guidelines for conducting environmental sustainability assessments of food and drink products; both for business-to-business and for business-to-consumer.

The Protocol is complementary to general requirements established for good practice for the environmental sustainability assessment of products using e.g. life cycle assessment, for example, and in line with associated standards such as ISO 14044. Building on the EC's Integrated Product Policy (IPP) Communication, the Protocol is equally complementary to the Product Environmental Footprint methodology contained in the annexes of the EC's Single Market for Green Products Communication. The Protocol, hence, does not duplicate these general methodologies. It provides added value through further guidance in the context of food and drink products.



² Food SCP Round Table Terms of Reference

³ COM(2008) 397, July 2008. Communication from the Commission to the European Parliament and the Council the European Economic and Social Committee and the Committee of the Regions on the Sustainable Consumption and Production and Sustainable Industrial Policy Action Plan

Figure 1. Inputs to the ENVIFOOD Protocol and its potential developments

The Protocol remains a general level document, providing added value at the sectorial level but where additional guidance is needed at the product category level for greater coherence, quality assurance, and increased possibilities for cost effectiveness. Additional considerations at the product category level would include providing a focus on which life cycle stages and impact categories are of main relevance for a product category; to define how to allocate resources consumed and emissions between co-products; and other aspects.

Within the Protocol, the benefits for further additional guidance to facilitate coherence, reproducibility, comparability and best practice at a sub-sectorial level are explicitly recognized. On several issues, recommendations are made where product category specific requirements could be beneficial. At the same time, coherence needs to be ensured across such product category specific guidance; hence reinforcing the necessity and role of the sectorial-level Protocol; including related updating as experience is gained at the product category level.

This document therefore outlines what is the current situation in relation to business needs for product category specific guidelines, what is already available, the role of policy and standards, and recommendations for governance in this context by the Food SCP Round Table.

2. Background and Policy Context

In addition to business-led initiatives, activities related to the environmental sustainability assessment of products are ongoing at the national, European, and global levels. These support both business and policy needs.

At the European level, the EC has recognized the community needs and continued its support through several commitments. Related Communications at the general level include:

- Integrated Product Policy Communication⁴
- Sustainable Consumption and Production Communication⁵
- European Commission Flagship and Roadmap on Resource Efficiency Communications⁶
- Single market for green products Communication⁷

These communications have led to clear recommendations such as the Product Environmental Footprint (PEF) Guide, as well as associated support activities such as the European Platform on Life Cycle Assessment and the development of PEF Category Rules (PEFCRs).

The PEF methodology was developed based on extensive experience in the community, and beyond. Related pilot studies to test the PEF included several food and drink product assessments.

⁴ COM(2003) 302

⁵ COM(2008) 397

⁶COM(2011) 21 and COM(2011) 571 respectively

⁷ COM(2013) 196

To further facilitate coherence and quality assurance, pilots have also been initiated for the development of PEF CRs. The second phase of these developments is foreseen to be focused on Food and Drink Products. A close cooperation between these PEF and the RT interests is, hence, foreseen.

3. Current Availability

Several guidelines have already been established for the environmental sustainability assessment of specific product categories by different stakeholders and through various processes. An overview is given in the Annex. Some of these support Type III Environmental declarations, commonly called Environmental Product Declarations (EPDs) ; a specific application governed by the general Standard ISO 14025. Nevertheless, alignment with the ENVIFOOD Protocol or other emerging requirements such as the EC's PEF Guide recommendations is unclear; coherence between product-level guidelines is currently not assured and not coordinated at the food/drink sectorial level.

4. Business perspective

[cited from the RT guiding principles 2010] *The Members of the Round Table support the voluntary provision of relevant product-related information along the food chain including to consumers and aim at identifying opportunities for continuous self-improvement. Therefore they consider it vital that the information provided is scientifically reliable, consistent, understandable and not misleading. Not only will the contrary undermine consumer trust in any type of information provided by the food chain and lead to accusations of "greenwashing", it will also run counter to the objective of contributing effectively to environmental improvement. Similarly, the growing number of different schemes and requirements will become untenable.*⁸

The Members of the Round Table recognise the need to establish a scientifically reliable, practical and harmonised environmental assessment methodology for food and drink products across Europe – including, as appropriate, product category specifications – to form the basis for voluntary communication of environmental information along the food chain, including consumers.

Members of the Food RT understand that

- need for coherence amongst methodologies and assessments need for cost-effective implementation solutions
- generalized recommendations such as ISO 14040/44 and EC's PEF Guide provide framework, but are not sufficiently specific. The RT Principles and ENVIFOOD Protocol provide further specified framework for food and drink products. However, explicitly foreseen that further specifications may need to be formulated at the product category level. At each level, harmonization and coherence

⁸ European Food SCP Round Table , July 2010 - *Voluntary environmental assessment and communication of environmental information along the food chain, including to consumers - Guiding Principles*

are increased, costs thus reduced to meet a growing range of business and government requirements.

- Key activity is development by EC of a recommended methodology for Product Environmental Footprint (PEF), including PEF category rules (PEFCRs) and PEF profile requirements. Test development of PEFCRs in the food and drink context is foreseen. Business direction could be beneficial to facilitate developments in line with FRT Protocol as well as business needs/positions.

Currently there is a series of specific food and drink products for which harmonized rules for the development of environmental sustainability assessments has not been developed yet. In several cases this is because specific categories are complex enough to develop category rules for the product in question. In this type of cases is where the SCP Round table should provide an especially dedicated technical support for sectors wishing to harmonise the rules to calculate LCAs within a specific product category. Furthermore is on the basis of the environmental information provided that companies can build their strategic product development plans and therefore it is highly relevant that this information is based on harmonized rules.

5. Key standards

Several standards are available at the national, European, and global levels in relation to the environmental sustainability assessment of food and drink products. The most notable at the international level are ISO 14040/44 and ISO 14025.

ISO 14040/44 provides a general framework for the assessment of emissions and resources consumed that can be associated with goods and services. It does not, however, provide further guidance for establishing product category specific guidelines.

ISO 14025 provides specific guidelines for the development of Product Category Rules (PCRs) in the context of Environmental Product Declarations. In general, these requirements are in line with the recommendations of the EC in the context of PEF Guide and PEFCRs. Nevertheless, some updates may be necessary to existing PCRs due to the specific application focus of ISO 14025 and general nature of such standards relative to the PEF. The level of effort to make such updates will be case specific and is currently unclear.

6. Other proprietary activities

Several other activities are notable in relation to environmental sustainability assessment and the provision of product category specific guidelines. These include:

- Guidance for Product Category Rule Development (Ingwersen and Subramanian (ed.), 2013)
- Related WRAP-led coordination activity of initiatives

7. The Protocol and product specific category rules

The ENVIFOOD Protocol provides guidelines for the environmental sustainability assessment of food and drink products. Guidance is at the sectorial level, supporting the practical implementation of the Principles and complementing more general methodological guidance such as ISO 14040/44 and the EC's PEF Guide.

The Protocol remains necessarily general; providing further guidance at the sector level that can be applied across the broad range of food and drink products. At the same time, it cannot provide detailed guidance on specific methodological rules relevant to specific sub-categories of products. This is the role of product category specific rules. This includes, for example, finding common agreements for e.g. key co-product allocation approaches, for which impact categories are most relevant, and well as for which process-specific data are required. As far as possible and based on current knowledge, the Protocol includes some provisions for where further product category specific guidelines could be helpful.

8. Round Table Governance Options related to product specific category rules

Given the mandate of the Food SCP Round Table, the Principles, the ENVIFOOD Protocol, and ongoing activities, it is necessary for the Round Table to identify and evaluate governance options in relation to the ongoing development of product category specific category rules. This will have implications in relation to the Protocol updating as well as in terms of the development of product category specific category rules themselves.

A first option, Option 1, would be for the Food SCP Round Table to do nothing. Reliance would be on the voluntary adherence to the Protocol of businesses when conducting assessments and if/when developing product categories specific rules. Studies conducted in the absence of such product specific rules would have improved quality assurance and coherence if following the Protocol and related general methodological recommendations/standards. At the same time, many key decisions that affect the outcome of the studies will be study specific; results may not be readily comparable even amongst similar products. Similarly, study costs would be high due to the necessity to evaluate several options and consider multiple iterations. No updates to the Protocol to include additional criteria related to common needs would be made. Overall, burdens on business and governments would remain high.

Another extreme, Option 2, would be for the RT to directly develop product categories specific category rules. Product categories of highest relevance/interest would need to be identified and working groups established. This would ensure a high level of stakeholder input and agreement. Financing or the provision of dedicated human resources would be necessary.

In between the 2 extreme options, Option 3, the RT could coordinate the development of specific product category rules for food and drink related products. These would need to be in-line with the ENVIFOOD Protocol. To also meet emerging PEF Guide requirements from the EC, these could equally be in-line with the more general provisions of the PEF and could be developed following guidance from the EC for the development of PEFCRs. More specifically, the RT could work in the development of

guiding documents for the development of PEFCRs addressing especially interactions and possible synergies in the production chain of the product categories under testing. The RT will participate in the identification and coordination of different PEFCRs for food and drink related products. Also the RT could participate in the evaluation of the results of the pilot test phase regarding PEFCRs . Equally, the ENVIFOOD Protocol could be periodically reviewed to e.g. include updates and additional general provisions that are found to be needed at the sectorial level.

Through Option 3, the Round Table would facilitate stakeholder awareness and involvement; including internationally. This can be particularly relevant where more than one constitutes is involved, or where coordination across product category specific rules is required. The Round Table could facilitate finding agreements on key methodological decisions, as well as ensuring that inputs are provided from e.g. its Working Group 1. Overall costs to business will be minimized through this option. Equally, the creation of product- category specific rules facilitates the development of associated tools for the efficient assessment of products in specific categories. The business model and costs to the RT would need to be reviewed.

9. Recommendations

Working Group 1 of the Round Table recommends an intermediate governance option; Option 3. The Round Table would act as e.g. a Steering body for the development of product category specific guidelines. This would include for the development of PEFCRs for food and drink products.

10. References

Guidance for Product Category Rule Development, version 1.0. 2013. Ingwersen, W., Subramanian, V., editors. The Product Category Rule Guidance Development Initiative. <http://www.pcrguidance.org>

Annex 1: Summary table of guidelines established for environmental sustainability assessment of specific product categories

Disclaimer: The list is not complete and is only provided for illustrative purpose. Reference to methodologies does not entail endorsement by the RT.

Sectorial methodologies	Status: In Drafting (D) or Published (P)	Country	Initiative
BP X30-323-15 (2012) Principes généraux pour l'affichage environnemental des produits de grande consommation - Partie 15 : méthodologie d'évaluation des impacts environnementaux des produits alimentaires	P	France	Granelle de l'environnement
Development of Carbon Calculator to promote low carbon farming practices - Methodological guidelines	D	European Union	Low carbon farming practices project, JRC. Contractor: Solagro
Climate Certification for Food 2010:2 - Klimatmarkning. 2010. Criteria for Mitigation of Climate Impact from Food Production and Distribution	P	Sweden	Climate Certification of Food
"Foodprint" - Finnish carbon footprint Protocol "Foodprint" for food products (Forthcoming release)	D	Finland	Project by MTT Agrifood Research
Sub-sectorial methodologies	Status	Country	Initiative
Beverage Industry Sector Guidance for Greenhouse Gas Emissions Reporting. Version 2. 2010	P	Worldwide	Beverage Industry Environmental Roundtable
PAS 2050-1:2012 Assessment of life cycle greenhouse gas emissions from horticultural products	P	UK	BSI
Supplementary requirements for the cradle to gate stages of GHG assessments of horticultural products undertaken in accordance with PAS 2050			
Sector specific guidelines and methods for the life cycle assessment of GHG emissions from livestock food chains	D	Worldwide	FAO's Partnership on the environmental benchmarking of livestock supply chains
Greenhouse gas (GHG) emissions from the global dairy cattle sector. A life cycle assessment	P	Worldwide	Organization of the United Nations (FAO) and International Dairy Federation (IDF) and Food and Agriculture

IDF, 2010. A Common Carbon Footprint Approach for Dairy: The IDF Guide to Standard Lifecycle Assessment Methodology for the Dairy Sector	P	Worldwide	IDF - The International Dairy Federation
Guidelines for the Carbon Footprinting of Dairy Products in the UK	P	UK	DairyUK, DairyCo, Carbon Trust
Carbon Footprint of the Australian Dairy Industry	P	Australia	Dairy Australia

Product-specific guidelines	Status	Country	Initiative
Beer (2011:21)	P	Sweden	International EPD system
General principles of the OIV GHG gas accounting Protocol for the vine and wine sector (2011)	P	Worldwide	The International Organisation of Vine and Wine (OIV)
Sustainability assessment methodology for wine	D	Italy	Italian Ministry of Environment
Packaged sparkling red, white and rose wines (in any kind of container and closure system) (2006:03)	P	Sweden	International EPD system
Wine of fresh grapes, except sparkling wine; grape must (2010:02) Updated on March 2013	P	Sweden	International EPD system
Fruit juices (2011:08)	P	Sweden	International EPD system
Fruit Juice	D	USA	The Sustainability Consortium
Bottled waters, not sweetened or flavoured (2010:11)	P	Sweden	International EPD system
Vegetables (2011:20)	P	Sweden	International EPD system
Fruit and nuts (2012:07)	P	Sweden	International EPD system
Kiwi fruit (2011:25)	P	Sweden	International EPD system
Jams, fruit jellies, marmalades, fruit or nut puree and fruit or nut paste	P	Sweden	International EPD system

(2011)

Table olives	D	Sweden	International EPD system
Virgin olive oils and its fractions (2010:07)	P	Sweden	International EPD system
Green coffee	D	Sweden	International EPD system
Coffee	P	France	Granelle II
Arable crops	D	Sweden	International EPD system
Nonglutinous Rice (Japonica) (2009)	P	Japan	Japanese Carbon Footprint Programme (CFP) Calculation and Labeling Pilot Program. 2009
Grain/cereals	D	USA	The Sustainability Consortium
Breakfast Cereal	D	USA	The Sustainability Consortium
Rapeseed oil (2009)	P	Japan	CFP Calculation and Labeling Pilot Program. 2009.
Grain mill products (2012:06)	D	Sweden	International EPD system
Bakery products (2012:06)	P	Sweden	International EPD system
Groats, meal and pellets of wheat and other cereals (2010:03)	P	Sweden	International EPD system
Pastry goods and cakes (2010:06)	P	Sweden	International EPD system
Bread and other bakers' wares (2010:05)	P	Sweden	International EPD system
Uncooked pasta, not stuffed or otherwise prepared (2010:01)	P	Sweden	International EPD system
Pasta, cooked, stuffed or otherwise prepared; couscous (2011:07)	P	Sweden	International EPD system

Refined sugar from sugar beet	D	Sweden	International EPD system
Frozen vegetables, pulses and potatoes (2012:08)	P	Sweden	International EPD system
Potato chips. (The products made with domestic potatoes direct from contracted farmers) (2009)	P	Japan	CFP Calculation and Labeling Pilot Program. 2009.
Sauces (2010:19)	P	Sweden	International EPD system
Meat of mammals (2012:11)	P	Sweden	International EPD system
Beef	D	USA	The Sustainability Consortium
Meat of poultry (2010:13)	P	Sweden	International EPD system
Chicken (PA-CP-01:2011)	P	Japan	JEMAI CFC Program
Raw milk (2013:16)	P	Sweden	International EPD system
Processed liquid milk and cream (2013:17)	P	Sweden	International EPD system
Milk	D	USA	The Sustainability Consortium
Yoghurt, butter and cheese (2013:18)	P	Sweden	International EPD system
Butter	D	USA	The Sustainability Consortium
Cheese	D	USA	The Sustainability Consortium
Flavored Yogurt	D	USA	The Sustainability Consortium
Finished bovine leather (2011:13)	P	Sweden	International EPD system
Leather footwear (2013:15)	P	Sweden	International EPD system
Leather	P	France	Granelle II

Wild caught fish, NPCR06 (2006). Expired in 2009

P

Norway

Norwegian EPD system (NEPD)