



European Food SCP Round Table

Voluntary environmental assessment and communication of environmental information along the food chain, including to consumers

Guiding Principles

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Guiding Principles

Objectives of the Guiding Principles:

The below Guiding Principles are the starting point of the work of the European Food Sustainable Consumption and Production (SCP) Round Table on the voluntary environmental assessment of food and drink products and the voluntary communication of environmental information along the food chain.¹ The assessment and communication of the environmental performance of food and drink supply chains can make an important contribution to the EU's environmental protection and SCP objectives.

To this end, this document lays down a number of Guiding Principles that shall be respected in the development of a harmonised framework methodology for the environmental assessment specifically of food and drink products and which shall form the basis of voluntary communication of environmental information along the food chain, including both business-to-business (B2B) and business-to-consumers (B2C). The Guiding Principles aim to promote consistency among approaches applied across Europe and to facilitate the provision of environmental information that is scientifically reliable, consistent, understandable and not misleading, while being practical to use and focussed, so as to enable informed choice.

Background:

The partners of the food and drink chain gathered in the European Food SCP Round Table are committed to helping consumers and other partners along the food chain to make informed choices by providing them with accurate and understandable information on relevant product characteristics, including environmental performance. Effective environmental information requires scientifically reliable and consistent environmental assessment methodologies to be applied along the food chain and the ability to effectively and efficiently communicate this information from one stage in the food chain to the next until it reaches the consumer.

More recently, an increasing number of food chain partners as well as public authorities have introduced a widening range of different initiatives to inform consumers and other stakeholders more broadly about various environmental characteristics of food and drink products and to support continuous improvement in associated environmental performance. These include various labels, statements, product declarations and other means addressing different environmental aspects or impacts² of a product³.

¹ For readability reasons, the term "food chain" is used in the remainder of this document as a synonym for "food and drink chain". It includes suppliers to the agricultural sector, agriculture, agro-food trade, food and drink processors, the packaging supply chain, transport & logistic operators, retailers and restaurants, consumers, including public procurers, and end-of-life operators.

² For definitions see page 4.

³ Examples: a product's carbon footprint, agricultural and fishing practices, transport mode or distance, packaging weight, recyclability, bio-degradability, renewability or impacts on biodiversity.

This ongoing proliferation of different initiatives shows a high degree of diversity in terms of their chosen scope, assessment methodologies and means and tools of communication. This reflects the vast variety of food and drink products and the complexity of their environmental aspects along the life-cycle, which is, *inter alia*, strongly influenced by natural processes at farm level. There is at present no commonly applied methodology to assess and communicate environmental information along the food chain, including to consumers, in a practical and reliable way⁴.

This situation has the potential to confuse or even mislead consumers and other stakeholders and to lead to unnecessary burdens for food chain operators. It should be borne in mind, however, that the assessment and communication of the environmental performance of food and drink products must comply with all existing Community rules laid down in the EU Treaty, including those on the free movement of goods⁵, and in secondary EU legislation, such as the rules aimed at protecting consumers against misleading and deceiving information⁶.

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.

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.

Questions to be considered in the process:

The first step in this process is for all involved food chain partners to learn more about the practical implications of the various environmental assessment and information systems, their scientific reliability, effectiveness, practicability, relevance for food chain partners and consumers, costs and benefits at the different food chain stages, possible shortcomings and barriers. Various essential questions need to be considered in this respect, including *inter alia*:

- How to measure, verify, collect and consolidate environmental information along the entire food chain in an efficient way?

⁴ Life-cycle Assessments (LCAs) based on ISO 14040 and ISO 14044 are conducted by different food chain partners for various purposes and are an important source of robust environmental information. LCAs in compliance with existing standards and recommendations involve costs, which make their systematic use across entire product portfolios unrealistic and virtually prohibitive for use by SMEs. LCA standards also leave a certain degree of flexibility in making methodological choices and results are not universally comparable. With a view to supporting life-cycle thinking/assessment while reducing complexity and costs, it is desirable to agree first on a harmonised methodology for the environmental assessment of food and drink products. Based on this harmonised approach, consistent LCAs and environmental criteria, e.g. in the form of key performance indicators for different product categories, can be developed, which will also help focus and simplify the collection of pertinent high-quality data in a systematic manner.

⁵ Articles 34 and 35 of the Treaty on the Functioning of the European Union

⁶ Including, *inter alia*, Directive 2000/13/EC on food labelling, Regulation 767/2009 on the marketing and use of feed, and Directive 2005/29/EC on Unfair Commercial Practices and the recently published European Commission guidance on its implementation (SEC(2009) 1666).

- How to consider the various environmental aspects and/or impacts of the production and consumption of different categories of food and drink products in a consistent framework methodology?
- How to consider specificities of highly diverse food and drink products with different beneficial and adverse environmental impacts at different stages of their life-cycle?

- What costs and benefits are involved as well as what challenges are the various food chain operators, including SMEs, facing or going to face in this respect?
- How should a uniform environmental assessment methodology be designed in order to support the identification of continuous environmental improvement potentials at all stages of the food chain?
- How effective are existing and emerging environmental information tools along the food chain and vis-à-vis the consumer? What kind of information is relevant for consumers? What type of questions could we and should we expect consumers and food chain partners to have now and in the near future? How can consumer confusion be avoided?
- What is already available at the European and international level to help assess and communicate the potential environmental impacts associated with the production and consumption of food and drink products?

Guiding Principles for further work on voluntary assessment and communication:

In order to address these questions systematically, the members of the Round Table agreed to define first a set of common guiding principles on voluntary environmental assessment and communication, before establishing concrete assessment methodologies. This will allow stakeholders to evaluate the results of ongoing and future work against the objective of providing environmental information which is scientifically reliable, consistent, understandable and not misleading.

The Guiding Principles do not lay down any specific methodology, instrument or tool to assess and communicate environmental information to consumers, nor are they intended to prejudge the outcome of ongoing work in this field. Existing and emerging methodologies and tools will be assessed during the second stage of the work of the Round Table in order to evaluate whether and how the Guiding Principles can be put into practice.

In developing these principles, use has been made of existing international, European and national standards and guidelines⁷ in the particular context of the food chain.

A voluntary and harmonised approach:

In order to support food chain partners of different sizes, structures and resources in their efforts to provide reliable environmental information in line with their corporate, sector and national conditions, the Guiding Principles promote the establishment of a voluntary framework methodology for the environmental assessment of food and drink products. The framework methodology shall be practical to use and shall avoid disproportionate burden or costs on the various food chain operators, while being scientifically robust. In order to ensure consistency and comparability of results, operators applying the assessment framework are required to

⁷ For example the ISO 14020 and 14040 series, EU Guidelines on Making and Assessing Environmental Claims, ICC International Code of Environmental Advertising, General programme instructions for Environmental Product Declarations (EPD).



apply life-cycle thinking⁸, where appropriate, supported by environmental assessment tools, with a view to identifying the significant environmental impacts along all food chain stages. All voluntary communication of environmental information shall comply with the Guiding Principles outlined in this document.

Environment in the sustainability context:

While the Guiding Principles focus, for topical reasons, on the environmental aspects of sustainability, it is vital to bear in mind that the concept of sustainable development is complex and includes important social and economic dimensions, which are not covered by the scope of this document. However, when designing sustainability strategies for the food chain, environmental considerations must be taken forward in a holistic, parallel consideration of ongoing work in the economic and social spheres of sustainability.

⁸ Life-cycle thinking aims at supporting decisions in public policy and in the private sectors by considering effects along the supply chain, during the use and end-of-life management of products with the aim of ensuring overall improvement and avoiding shifting impact from one stage of the life-cycle to another (Joint Research Centre).

The Guiding Principles

Definitions:

Building on international standards under ISO.⁹ Unchanged ISO definitions are produced below in *italic style*. Food chain specific additions / refinements are produced in roman style.

Food and drink product:

*Any substance or product, whether processed, partially processed or unprocessed, intended to be, or reasonably expected to be ingested by humans.*¹⁰

Life-cycle of food and drink products:

Consecutive and interlinked stages of the food and drink production and consumption system, ranging from activities related to input supply to agriculture, agricultural production, processing, packaging, transport and logistics, retail, consumption and end-of-life.

Environmental aspect:

An environmental aspect is an element of an organisation's activities, products or services which can interact with the environment. This may include outputs (e.g. emissions to air, releases to water and to soil) as well as inputs (e.g. the use of resources).

Environmental impact:¹¹

Changes to the environment, adverse or beneficial, that result from environmental aspects are called environmental impacts. The relationship between environmental aspects and impacts is one of cause and effect.¹²

For example, the aspect "release of greenhouse gas emissions" contributes to the environmental impact "climate change". Other environmental impacts include, for example, the acidification of soils and surface water, eutrophication of water bodies, eco-toxicity, resource depletion or changes in biodiversity. Environmental issues of concern to which environmental aspects may be assigned are called impact categories.¹³

Significant environmental impact:

The significance of an impact is determined considering its contribution to the change to the environment, legal issues and the concerns of internal and external interested parties.

Life-cycle assessment (LCA):

Compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product system throughout its life-cycle.

Product category:

A group of food and/or drink products subject to a common specification of the environmental assessment framework methodology.

⁹ Including: ISO 14044:2006: Environmental management – Life-cycle assessment – requirements and guidelines; ISO 14021:2001: Environmental labels and declarations -- Self-declared environmental claims (Type II environmental labelling); ISO 14025:2006: Environmental labels and declarations -- Type III environmental declarations -- Principles and procedures;

¹⁰ See Regulation (EC) 178/2002 laying down the General Principles and requirements of Food Law.

¹¹ It should be noted that 'environmental impact' is used synonymously in the context of this document for contributions to impacts or risks or pressures on the environment.

¹² To improve clarity, we may consider adding an example for activity, aspect and impact (e.g. activity: road transport; aspect: CO2 emissions; impact: climate change).

¹³ See ISO 14044:2006: Environmental management – Life-cycle assessment – requirements and guidelines

Misleading actions:¹⁴

*In the context of this document, a commercial practice shall be regarded as misleading if it contains false *environmental* information and is therefore untruthful or in any way, including overall presentation, deceives or is likely to deceive the average *food chain partner* or consumer, even if the information is factually correct, in relation to one or more *environmental aspects or impacts of a product*, and in either case causes or is likely to cause them to take a transactional decision that they would not have taken otherwise.*

Misleading omissions:¹⁵

*In the context of this document, a commercial practice shall be regarded as misleading if, in its factual context, taking account of all its features and circumstances and the limitations of the communication medium, it omits material *environmental* information that the average *food chain partners* or consumer needs, according to the context, to take an informed transactional decision and thereby causes or is likely to cause the average *food chain partner* or consumer to take a transactional decision that they would not have taken otherwise.*

Environmental information:

In the context of this document, environmental information covers environmental product performance information as well as use-related environmental advice.

Environmental product performance information can be qualitative or quantitative. It can either indicate the overall environmental performance of a product, i.e. it covers all significant impacts over the full life-cycle, or it indicates specific/individual environmental aspects or impacts of a product along its life-cycle or at certain stages thereof. Environmental product information aims to support informed choice. Use-related environmental advice is information passed on to downstream partners in the food chain, including to consumers, with the aim to enable them to minimise environmental impacts during use, handling and disposal of the product.

¹⁴ See Article 6 of the UCP Directive

¹⁵ See Article 7 of the UCP Directive

The principles

The lead principle:

Environmental information communicated along the food chain, including to consumers, shall be scientifically reliable and consistent, understandable and not misleading, so as to support informed choice.

I. Principles for the voluntary environmental assessment of food and drink products

- Principle 1: Identify and analyse the environmental aspects at all life-cycle stages
- Principle 2: Assess the significant potential environmental impacts along the life-cycle
- Principle 3: Apply recognised scientific methodologies
- Principle 4: Periodically review and update the environmental assessment

II. Principles for the voluntary communication of environmental information

- Principle 5: Provide information in an easily understandable and comparable way so as to support informed choice
- Principle 6: Ensure clarity regarding the scope and meaning of environmental information
- Principle 7: Ensure transparency of information and underlying methodologies and assumptions

III. Principles for both voluntary environmental assessment and communication

- Principle 8: Ensure that all food chain actors can apply the assessment methodology and communication tools without disproportionate burden
- Principle 9: Support innovation
- Principle 10: Safeguard the Single Market and international trade

The lead principle:

Environmental information communicated along the food chain, including to consumers, shall be scientifically reliable and consistent, understandable and not misleading, so as to support informed choice.

Scientifically reliable and consistent:

In order to be scientifically reliable, the environmental assessment shall be based on methodologies and scientific data that are recognised and widely accepted in scientific or professional disciplines and that are sufficiently thorough and comprehensive to produce results that are accurate and reproducible. To the extent possible, data should be coherent with the assessment methodology. Use shall be made of international and European standards and recommendations and of derived sector-specific guidance documents, as applicable.

In order to ensure consistency in assessing the significant environmental impacts of food and drink products, a common framework assessment methodology shall be applied to all food and drink products. Where necessary, methodological specifications should be applied at the level of product categories, but they shall be in line with the common framework methodology.

Easy to understand and not misleading:

Environmental information shall be communicated to food chain partners and consumers in an easily understandable, factual and unambiguous way, so as to support informed choice.

Operators shall use the means and format of communication that is the most suitable and effective to support informed choice by the recipient of the information.

Assessment methodology and communication shall ensure, to the extent possible, comparability of presented environmental product performance information.

Information shall be relevant, addressing the significant environmental impacts related to the product life-cycle. Where communication of environmental information is limited to individual environmental aspects or impacts along the life cycle, or to specific life-cycle stages, the scope and meaning of the provided information must be specified in a clear, accurate and unambiguous manner. In particular, such information shall not be presented as reflecting the overall environmental performance of the product. If in such cases quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensure consistency and comparability.

In addition, and in accordance with the requirements of Directive 2005/29/EC on unfair commercial practices, environmental information must not be misleading in any way.

I. Principles for the voluntary environmental assessment of food and drinks products

Principle 1:

Identify and analyse the environmental aspects at all life-cycle stages

In order to enable an accurate assessment of the overall environmental performance of different food and drink products, their respective environmental aspects at all life-cycle stages shall first be identified, inventoried and analysed. Such life-cycle data must be well-documented in an appropriate format.

Principle 2:

Assess the significant potential environmental impacts along the life-cycle

Environmental aspects along the life-cycle of different food and drink products contribute to different associated environmental impacts. In order to provide an accurate picture of the product's overall environmental performance, the significant environmental impacts along the life-cycle shall be assessed. Depending on the type of product, they may fall into different environmental impact categories.

In order to improve consistency in conducting the above analysis and assessment, methodological specifications of the framework assessment methodology shall be applied at the level of product categories where necessary but they must be in line with the common framework methodology.

Principle 3:

Apply recognised scientific methodologies

The environmental assessment shall be based on scientific data and methodologies that are sufficiently thorough and comprehensive to produce results that are accurate and reproducible. The applied assessment methods shall be recognised and widely accepted in scientific or professional disciplines or be otherwise scientifically defensible. To the extent possible, data should be coherent with the assessment methodology and the development and use of standardised data sets should be facilitated whenever possible. Use shall be made of international and European standards and guidelines and derived sector-specific guidance documents, as applicable.

The process of developing assessment methodologies shall include an open, participatory consultation with all interested parties. Reasonable efforts shall be made to achieve a consensus throughout the process.

Principle 4:

Periodically review and update the environmental assessment

A periodic review of the basis for the assessment should occur to account for innovation and other significant changes along the supply chain, updates in data and improvement in assessment methodologies. This review should be conducted at a frequency consistent with the pace of innovation.

II. Principles for voluntary environmental communication along the food chain including to consumers

Principle 5:

Provide information in an easily understandable and comparable way so as to support informed choice

For environmental information to be effective, i.e. to enable partners along the food chain including consumers to make informed choices, it has to be presented in an easily understandable, factual and clear way.

Assessment methodology and communication shall ensure, to the extent possible, comparability of presented environmental product performance information.

There is a multitude of means (i.e. channels) through which environmental information can be communicated (i.e. conveyed) along the food chain and to consumers, including through websites, reports, leaflets, on-shelf, on a product or packaging, through media, advertising, technical bulletins, product literature, declarations, or any emerging new communication technologies.

Equally, there is a multitude of different formats to present (i.e. to display) environmental information, including qualitative and quantitative statements, symbols, tables or graphics.

Given the high diversity of food and drink products and actors along the food chain, operators shall use the means and format of communication that is the most suitable and effective to support informed choice by the recipient of the information.

Different means and formats of communication can be used for different products and for different recipients at different stages of the food chain (e.g. formats to communicate with consumers (B2C) may differ from those aimed at customers along the food chain (B2B) or at public authorities). Efforts shall be made to work towards harmonisation within individual formats (e.g. to avoid a proliferation of different graphics or symbols).

Principle 6:

Ensure clarity regarding the scope and meaning of environmental information

The communication of environmental information to food chain partners and to consumers shall reflect the scope of the underlying assessment of significant environmental impacts along the life-cycle.

Where the environmental information is limited to individual environmental aspects or impacts along the life-cycle, or to specific life-cycle stages, the scope and meaning of the provided information must be specified in a clear, accurate and unambiguous manner. In particular, such information shall not be presented as reflecting the overall environmental performance of the product. This clarification could, for instance, take the form of a clarifying statement and/or an unambiguous design of graphics and labels or via other means and channels of communication. It shall be easily accessible and understandable for the food chain operators or the consumer. If in such cases quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensure consistency and comparability so as to support informed choice.

In addition, and in accordance with the requirements of Directive 2005/29/EC on unfair commercial practices, environmental information must not be misleading in any way.

The communication of environmental information must not create the impression that the product has a positive environmental impact or lower adverse environmental impacts than a comparable product where this claim is not true or cannot be verified. The communication must not emphasise one single environmental aspect or impact if this creates the wrong impression

of reflecting the product's overall environmental performance along its life-cycle. In addition, it must not hide negative environmental trade-offs along the product life-cycle.¹⁶

Misleading practices in communicating environmental information include both misleading actions and misleading omissions.¹⁷

III. Principles for both voluntary environmental assessment and communication

Principle 7:

Ensure transparency of information and underlying methodologies and assumptions

Environmental information shall be transparent. i.e. Information concerning the assessment procedure, methodology, data source, criteria, underlying principles, assumptions and boundary conditions shall be available to all interested parties on request and clearly referenced in line with international standards and recommendations. There may be limits to the availability of specific information due to confidential business information, intellectual property rights or other legal restrictions. In the latter case, independent peer review and/or accreditation shall provide a basis to retain confidentiality whilst securing consumer confidence.

Environmental information shall be accurate. Limitations to the validity of the information (including uncertainty, e.g. due to quality of data and applied methodology) should be made available. All data-sources shall be documented, clearly identified and credible.

Principle 8:

Ensure that all food chain actors can apply the assessment methodology and communication tools without disproportionate burden

Procedures and requirements for the voluntary assessment of food and drink products and for voluntary communication of environmental information shall be limited to those necessary to ensure that the provided information is scientifically reliable, consistent, understandable and not misleading, so as to enable informed choice.

All actors along the food chain, regardless of size (including SMEs), shall have equal opportunity to voluntarily assess their products and to communicate environmental information. Involvement shall not be hindered by extraneous factors or requirements such as procedural complexity, disproportionate costs, or unreasonable information or bureaucratic demands.

Principle 9:

Support innovation

Procedures and requirements for the voluntary assessment of food and drink products and for voluntary communication of environmental information shall always take into account and promote innovation to improve the performance of the product, including its environmental performance along the life-cycle.

Environmental information shall be expressed in terms of performance and continuous improvement rather than product design or descriptive characteristics. This approach leaves maximum flexibility for technical or any other type of innovation. Prescriptive design criteria or implicit preference for a technology shall be avoided.

¹⁶ This paragraph is based on the new EC guidance on the UCP Directive

¹⁷ See Articles 6 and 7 of UPC Directive.

Principle 10

Protect the environment and increase consumer awareness whilst safeguarding the Internal Market and international trade agreements

Procedures and requirements for the voluntary environmental assessment of products and voluntary communication of environmental information, including to consumers, have as main objectives environmental protection, improving consumer awareness, a shift towards more sustainable consumption and production patterns and the promotion of green growth. They shall not be prepared, adopted, or applied in a manner which would constitute a distortion of competition or an unjustifiable obstacle and to the proper functioning of the Internal Market of the European Union and to the international trade agreements. The current development of international and EU standards on the environmental assessment and communication of products, both in the EU and in Third Countries, will help promote a smoother articulation between the two legitimate objectives of free trade and environmental protection.

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