

Dear Mr/Mrs,

Hereby we would like to contribute to the consultation on the European Food SCP Round Table draft report: 'Communicating environmental performance along the food chain': The reports gives an interesting and wide range of communication tools, divided in b2b tools and b2c tools. The report gives a lot of aspects of the different information tools.

In our experience tools are not exclusively used for b2b or b2c. Tools are used in mixed ways. In the chain for example product certificates (in the report b2c) can be also used as a b2b purchasing instrument. E.g. certified organic products are used to purchase ingredients without residues pesticides for baby food production. The consumer is not informed about the organic ingredients in the end product.

Information tools can be divided probably better be categorized on the basis of

- Their content: From single-issue qualitative issues, to single issue quantitative issues and a mix of that, to multi issue qualitative/quantitative issues and a mixes of that.
- Another aspect is the range of reliability of the information: estimated, measured, control system, third party certification.
- Related to product/processes or product systems/businesses

The focus of this report is the communication of environmental performances to consumers. In our experience the communication of this aspect of food is more and more a b-to-b subject.

The product-related information types (3.2.1) which are worked out in the chapter 3. Business to Consumer communication do play a bigger role in B2B communication. The position of the consumer as making 'informed choices' on environmental/sustainable aspect is in our opinion overestimated. The choices are more and more made by the retailers and foodservice organizations (catering). They are searching for reliable product certification systems on sustainability/environmental aspects. Development of private (retail) labels is important for the growth of the amount of more environmentally friendlier product in the supermarket. Dutch example's: Puur en eerlijk (Albert Heijn), Jumbo bewust (Jumbo), Eerlijk en heerlijk (Sligro), Gewoon H'eerlijk (Kruideniergroep). Several retailers made the decision to offer only more sustainable choice in the nearby future, to start with their private label products.

Questions

- Do you have any comments on the "Setting the context".

What is the aim of the report? To make a guideline on? To set criteria? To prepare for special legislation. According to the context the report should address the issues about communication on environmental aspects of food and provide an aligned guidance for the European food chain.

The recommendations do not really match this. In our opinion this is caused by the complex relation between the Guiding Principles (which are in itself an 'aligned guidance!') and the report. The report is built on an evaluation of environmental communication from the point of view of the Guiding Principles. In a lot of situations food chains do things with are not in line with the Guidance but in a far better way for environmental transparency for the consumer.

In our opinion it is too complex to draw general conclusions from the content of this report.

- Do you have any comments on the Business-to-Consumer" chapter?

The label/information on the product is a just guarantee of a much more complex content which is 'summarized' by the label. Product labels alone does not provide all the transparency on multi-issue criteria. Environmental effects of products (which are conform the minimum criteria of a label) can differ a lot.

It is therefore important that product labels facilitate the evaluation of the criteria to allow food chains to grow in there sustainability steps. ISO type I labels can be open for evaluation during the time, a periodically evaluation can guarantee flexibility.

IT makes it more and more possible to get the total information. This is a key to transparency/communication on environmental aspects of food. The stakeholders (Experts, NGO's, farmers governmental organizations, food industry) valueate the content of the labels. Only for a small part of the consumers the total content behind a label is an issue.

Harmonization of food standards on environmental/sustainability information is a very important issue.

In our opinion footprints/indexes per theme need to be harmonized.

Food prints/indexes per theme should be the basics of certification schemes/labels on environment.

The interpretation on environmental information on food is very complex,

However the combination of multi-issue information of a product can be summarized/evaluated in an indication of more or less environmental impact.

We compare it with the dashboard of a car: it is impossible to give one figure for total impact. The individual meters should not be in the red part of a meter and for an expert it is possible to answer the questions if something is wrong with the car.

Several remarks in the text on one communication tool are also applicable for other tools but not mentioned there. The report should be reviewed on that to make it more accurate.

- Do you have any comments on the "Business-to-Business" chapter?

Even single issue information is not easy to understand for the consumer. Even when single issue information is set in its context (E.g. footprint information: what does a x liter water/x kg CO2 mean to an average consumer?). Single and multi-issue information need to be evaluated by experts.

Communication of sustainable aspects goes hand in hand with tracking and tracing and brings a need for more transparency in the chain. Guiding principles of Voluntary environmental assessment cannot prevent extra burden in registration/certification if the market asks extra guarantees on certain in formation. The market/stakeholders determines what is disproportionate and what is not.

- Do you have any comments on the recommendations?

See context.

It is not clear why ISO type I labels are not recommended for communication on-pack?

- Do you agree/disagree with the given terminology in the glossary?
- Can you provide examples of best practices in different chapters?
- Do you have any other comments

As we are invited by Jeroen van Laer to give a presentation on Milieukeur for food on the meeting of the Round table wg2 on 27th of September we would be able to answer questions on this contribution if necessary.

Kindest regards,
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