

# ENVIRONMENTAL PERFORMANCE OF PRODUCTS & BUSINESSES – SUBSTANTIATING CLAIMS

## *EAPF Position*

Brussels, 2 December 2020

The European Alliance for Plant-based Foods (EAPF) welcomes the European Commission's work on substantiating green claims. We are fully supportive of the need to ensure a clear, consistent and reliable comparative method to substantiate environmental claims on products, in order to empower consumers to make conscious and more sustainable choices.

Green claims, expressed through labelling (whether in written or pictorial form), can be an educational and informative tool to communicate about the environmental impact of a product, playing an important role in guiding consumers' choices.

However, the current landscape of environmental labels is fragmented. Not only are they based on different methods that confuse consumers, but their use can also be misleading or respond to abusive marketing practices.

EAPF therefore strongly supports a common methodology to substantiate green claims. Nonetheless, **the Product Environmental Footprint (PEF) and the Product Environmental Footprint Category Rules (PEFCRs) as they stand, do not facilitate consumers' transition towards more sustainable choices.** EAPF, therefore, would support such methods **only** if the following points are integrated:

- **Comparability based on products' functionality and use.** In its PEFCRs Guidelines, the European Commission explicitly states that '*meaningful comparisons can only be made when products are capable of fulfilling the same function (as expressed in the functional unit)*<sup>1</sup>'. EAPF fully endorses this perspective: consumers should compare the environmental performance of food products having similar functionality and use. This is the case, for instance, of plant-based drinks and animal dairy, which should be assessed within the same category, as the former represents **the alternative offer within the same functional category** (e.g. breakfast drinks). Yet, the composition-based approach of the current food PEF limits consumers' empowerment to make more

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<sup>1</sup> Product Environmental Footprint Category Rules Guidance, May 2018, page 28  
[https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR\\_guidance\\_v6.3.pdf](https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR_guidance_v6.3.pdf)

sustainable choices, especially in light of rising scientific evidence urging a shift towards more plant-based diets, both for environmental and health reasons. Hence, being able to compare animal- and plant-based options is key to make well-informed decisions.

- **Focus on the most meaningful environmental factors.** Even though all environmental impacts are relevant, consumers may not be able to grasp them all through a label. 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 / CO<sub>2</sub>-eq emissions**. Other priority environmental impacts should be freshwater consumption and land occupation.

Beyond the above-mentioned points, an effective methodology for environmental claims (based on PEF or other methods) must rely on the following fundamental principles:

- **Evidence-based methodology.** The method should rely on solid criteria and validated information derived from verified (scientific) research, consumer studies and tracing mechanisms. It should also be based on existing international standards which are used in assessing the environmental lifecycle of products<sup>2</sup>.
- **Transparency.** It should be as clear as possible, allowing consumers to understand the rationale behind the claims as well as their meaning.
- **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 product's ingredients provided by their suppliers.
- **Voluntary scheme.** The environmental labelling scheme should be voluntary, and, if applied, it should focus on the most meaningful environmental impacts such as climate impact and carbon emissions.
- **Absolute values, in combination with colour coding.** Labels encompassing absolute values allow for transparent communication, in a comparable way, about a product's impact<sup>3</sup>. In terms of carbon emissions, for instance, absolute emission values indicate the product's carbon footprint in kg CO<sub>2</sub> / kg of food<sup>4</sup>. These labels facilitate consumers' communication as they target a specific yet major environmental impact such as GHG emissions. Such values should be the default choice, and could be combined with colour coding for better transparency.

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<sup>2</sup> 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.

<sup>3</sup> Camilleri, A.R. et al. Consumers underestimate the emissions associated with food but are aided by labels. *Nature Clim Change* 9, 53–58 (2019). <https://doi.org/10.1038/s41558-018-0354-z>

<sup>4</sup> Oatly introduced in 2019 the [carbon declaration](#) which shows the CO<sub>2</sub> equivalent for all products.



- **Comprehensive**, including externalities from within and outside the EU. A comprehensive methodology should be based on a life-cycle approach that includes the environmental costs at all stages of the products' supply chain, occurring both inside and outside of the EU. Import of animal feed is an example of an externality that may not be taken into account in assessing the environmental performance of animal-based products, while considerably influencing their environmental footprint.
- **Coexistence with other labels**. The methodology should harmonise environmental claims while leaving the opportunity to use currently recognised and trusted labels (e.g. RSPO, UTZ).
- **Innovation-driven**. The method should encourage producers to improve the sustainability of their production processes and being able to communicate it to consumers.
- **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.

EAPF supports a common methodology that would allow comparability across food categories based on the products' functionality and use. Such method would communicate to consumers in an easy way the environmental impact of food products, prioritising climate impact and carbon emissions expressed via absolute values (paired with colour coding if necessary).

*The European Alliance for Plant-Based Foods (EAPF) brings together like-minded organisations in the plant-based value chain around a unique mission: To put plant-based foods at the heart of the transition towards more sustainable and healthy food systems. The Alliance represents the entire plant-based value chain: Food producers and manufacturers, NGOs, nutritionists, research & academia, and consumers.*