

POSITION PAPER

Sustainable EU Food Systems

Sustainability labelling

— KEY MESSAGES —

- ▶ Coexistence of the organic logo with other sustainability labels/logos may create confusion and erode consumers' confidence in the organic standard. Instead of creating competing schemes, we propose that any future EU sustainable food standard should build upon the well-recognized organic one.
- ▶ In its current form, the EU Product Environmental Footprint (PEF) seems inappropriate to assess the environmental performance of EU agricultural products.
- ▶ Methodologies to measure the environmental performance of agri-foodstuffs should be consistent with existing DG AGRI's schemes on environmentally sustainable food & farming practices, stemming from the Farm to Fork Strategy.

OPTA Europe (www.opta-eu.org) is the membership organization representing the interest of European Organic Processing and Trade companies. Its members account for a large share of total EU trade and processing of organic products and play an essential role in an efficient supply chain.

As discussions on the future Sustainable Food Systems and sustainability labelling are ongoing, OPTA Europe would like to share the following comments:

- ▶ **Coexistence of the organic logo with other sustainability labels/logos may create confusion and erode consumers' confidence in the organic standard.**

The Commission, Member States and the organic sector have successfully increased the recognition of the organic logo among consumers. According to the 2020 Eurobarometer survey¹, 56% of EU citizens recognise the organic logo, up from 27% in 2017. A continued

¹ https://ec.europa.eu/info/food-farming-fisheries/key-policies/common-agricultural-policy/cap-glance/eurobarometer_en

support to promote the organic logo is an integral pillar of the EU Organic Action Plan, adopted in 2021 in the broader framework of the European Green Deal.

OPTA Europe is favorable to conveying clear information about the sustainability impact of food products. However, we fear that the coexistence of the organic logo with other sustainability labels/logos will just puzzle consumers and erode the confidence in the organic logo, in a way that runs counter to the Farm to Fork Strategy's objective to stimulate organic food production and consumption in the EU.

Instead of creating competing schemes, we propose any future EU sustainable food standard to build upon the well-recognized organic one. In this line of thought, we suggest the option that, for products that lie within the scope of Council Regulation (EC) No 848/2018 on organic production and labelling of organic products, only those products certified as organic would be eligible to bear an additional logo/label on environmental sustainability.

► **In its current form, the EU Product Environmental Footprint (PEF) seems inappropriate to assess the environmental performance of EU agricultural products.**

We welcome the huge step that the EU Product Environmental Footprint (PEF) methodology has represented to harmonize the way Life Cycle Assessment (LCA) of products is carried out in the EU. However, we consider that, in its current form, it is not suitable to assess the environmental performance of agri-foodstuffs:

- It fails to reflect the benefits of extensive agroecological systems.

The methodological choice is not neutral. Life Cycle Assessment (LCA) methods -such as the EU Product Environmental Footprint (PEF) - have been developed to assess industrial products and might not be appropriate to represent agricultural systems. This is partly because LCA rarely considers aspects that agroecology aims to improve (soil health, biodiversity status, pesticide use impacts)². Those aspects are however featured prominently in the Farm to Fork Strategy.

² Hayo van der Wer, Marie Trydeman Knudsen, Christel Cederberg, Towards better representation of organic agriculture in life cycle assessment. Nature Sustainability, Springer Nature 2020.

To fairly assess the environmental footprint of food and to avoid jeopardizing the Farm to Fork Strategy's objectives, the PEF methodology must be complemented by additional indicators on key aspects that have been neglected.

- Limited number of existing PEF Category Rules for foodstuffs.

Product Environmental Footprint Category Rules have been developed for a very limited number (6) of food and drink sectors; there is a huge gap to be bridged. It is still unclear how PEFCRs can be developed on a large scale to cover all food and drink sectors.

- Need for cost-benefit analysis and impact on SMEs.

Life-cycle-assessments for one single product cost tens of thousands of Euros. A huge number of category rules will need to be developed and tested. An in-depth preliminary cost-benefit assessment associated with the use of PEF on foodstuffs is necessary. This is particularly crucial, if the cost of developing the PEFCR is to be borne by industry, which in the organic sector is mostly composed by SMEs.

Once the PEF Category Rule is set, collecting the primary and secondary data and verifying the results by an independent third is still costly and burdensome. This represents another obstacle for businesses to apply this methodology, in particular for small business and for those offering a large assortment of products.

The OEKO-PEF research project³ has calculated the footprint of three organic food products, based on existing PEFCR for pasta, dairy and meat. The results were made public in April 2022. Firstly, they show the difficulty for operators to understand and to apply the complex PEF methodology. Secondly, the incongruous results for the three products at stake confirm that the PEF is blind to the main features of the organic scheme, such as biodiversity preservation, animal welfare or soil management.

³ <https://www.fibl.org/fr/sujets/projet-base-donnees/projet-item/project/1794>

- ▶ **Methodologies to measure the environmental performance of agri-foodstuffs should be consistent with existing DG AGRI's schemes on environmentally sustainable food & farming practices, stemming from the Farm to Fork Strategy.**

The European Green Deal and the Farm to Fork Strategy have laid out a clear vision on EU food and farming based on lower GHG emissions, biodiversity preservation and improved animal husbandry.

The European Commission's Annual Work Programme on Information and Promotion Measures for Agricultural Products is designed to contribute to the realisation of the EU political priorities, in particular the objectives of the climate and environmental ambition of the CAP, the European Green Deal and the Farm to Fork Strategies.

Consistently, the 2022 Work Programme⁴ contains a strand conceived to "*reduce dependency on pesticides and antimicrobials, reduce excess fertilisation, increase organic farming, improve animal welfare, and reverse biodiversity loss*", together with the list of award criteria⁵ in line with those objectives.

For the sake of consistency, any methodology to measure the environmental performance of agri-foodstuffs must be in line with these criteria on environmentally sound food & farming practices.

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⁴ https://ec.europa.eu/info/sites/default/files/food-farming-fisheries/key_policies/documents/commission-decision-c2022-9236-annex_en.pdf

⁵ (i) *climate change mitigation (e.g. reduction in greenhouse gas emissions) and/or adaptation (e.g. water savings, climate-resistant crops and crop varieties)* (ii) *biodiversity conservation and sustainable use of natural resources (e.g. wildlife, landscape, genetic resources)*; (iii) *sustainable water management (e.g. water use efficiency, reduction of nutrients or pesticides load)*; (iv) *sustainable soil management (e.g. erosion control; nutrient balance; prevention of acidification, salinization, reduction of pesticides)*; (v) *sustainable, carbon-efficient methods of livestock production*. (vi) *reduction of use of antimicrobials* (vii) *reduction of food loss and food waste* (viii) *sustainable consumption* (viii) *animal welfare*.