

PFP's positioning on the Environmental assessment, communication and continuous improvement of its products.

- ✓ The context.
- ✓ PFP principles on the assessment and communication of their products' environmental performance.
- ✓ PFP involvement with other stakeholders.

The context

In parallel to the Commission's work on Sustainable Consumption and Production (SCP) and Sustainable Production, markets are seeing a proliferation of national and private initiatives for the environmental labelling of food products. The approaches are diverse in terms of scopes and methodologies, which adds some confusion to the topic, and leads to the introduction of inefficiencies in supply chains.

The Primary Food Processors' principles on the assessment and communication of their products' environmental performance

1. The Primary Food Processors of the EU (PFP) are committed to continuously improve the environmental performance of their products. They also share the belief that, whatever form of environmental communication is chosen by operators, it must be transparent and thus reflect the overall environmental impact of a product, process, factory or company.
2. PFP adheres to the *Guiding Principles for the voluntary Assessment and Communication of Environmental Information along the Food Chain including to consumers* developed by the European Food SCP Roundtable of which PFP is a member organization.*
3. Yet, PFP believes that companies should be left with a sufficient degree of freedom to implement the methodological options and communication tools they deem more appropriate and adapted to their own specificities.
4. PFP members advocate that such environmental communication schemes must remain voluntary.
5. A significant part of the environmental impacts of PFP products is attributable to the agricultural phase. Hence, their performance will be influenced to a high extent by several external variables which are beyond our control, e.g. the influence of different weather and agronomical conditions and the resulting agricultural yields.
6. With regards to the assessment of the environmental impacts of their products, PFP members intend to avoid simplistic systems that would solely be based on a single

* http://www.food-scp.eu/files/Guiding_Principles.pdf



environmental indicator like e.g. carbon footprint.

7. If ever a unified system was to be agreed for the entire food chain, PFP considers that the latter should be as cost-effective as possible. Cost effectiveness should be measured by comparing the amount of effort required by operators to achieve an accurate measurement of environmental performance versus the usefulness of the obtained data so as to allow consumers to make meaningful and informed choices.

The Primary Food Processors' involvement with other stakeholders

Primary Food Processors take their responsibility as partner of the food and feed chain and constructively participate in the developments of the Food Sustainable Consumption and Production Round Table (<http://www.food-scp.eu>) as a member of the Food and Drink constituency.

The Food SCP Round Table advocates for a coherent and harmonised approach to assessing and communicating the environmental performance of food and drink products across Europe while striving for continuous improvement. Primary Food Processors support this initiative while highlighting the following important points:

- The Round Table has an international scope, providing for an appropriate level of harmonization and strives for a scientific, objective approach, providing methodological framework and communication tools which can help countering protectionism. For this reason, members of the Round Table should try to align any of their own national and EU initiatives with the available outcome of the Round Table.
- The membership represents the whole food supply chain and such representation is the best way to arrive at a balanced and widely-recognised approach.
- The Round Table considers multiple environmental aspects and all life cycle stages thereby aiming at an integrated approach.
- The Round Table recognises that conducting environmental assessments requires transparency to avoid unfair competition due to inconsistent or biased methodologies and green washing.

The Primary Food Processors of the EU (PFP) is composed by:

European Starch Industry Association (AAF)
European Committee of sugar manufacturers (CEFS)
European Flour milling association (The European flour millers)
European Vegetable Protein Federation (EUVEPRO)
European Oil and Proteinmeal Industry (FEDIOL)

PFP members process approximately 220 Mio tons of raw materials (cereals, sugar beet, rapeseed, soybeans, sunflower seeds, crude vegetable oil, starch potatoes...) employing over 120 000 people in the European Union.