



FEASIBILITY STUDY 'EU ECOLABEL FOR FOOD AND FEED PRODUCTS'- EEB AND BEUC POSITION

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EEB, European Environmental Bureau

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Introduction

This joint position of EEB and BEUC is our organisations' input to the questionnaire concerning a **Feasibility study on an EU Ecolabel for food and feed products**. The aim of this study is to provide recommendations to the European Commission on the potential extension of the EU Ecolabel to the food, feed and drink sector.

Part 1

Question 1

Please enter your full name and surname (All information you provide in this survey is anonymised).

Ruth Veale
Head of Food, Health, Environment and Safety BEUC
Łukasz Woźniacki
Ecolabel coordinator EEB/BEUC

Question 2

Please enter the name of your company/organisation/department (All information you provide will be anonymised).

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Question 3

Please indicate the kind of company, organisation or department you represent by checking the respective box(es).

Check any that apply

- Food or drink processor
- Food or drink umbrella or labelling organisation
- Feed processor or feed retailer
- Food or drink retailer
- Food or drink wholesaler
- Farmer association
- Public administration
- Consumer NGO

- Environmental NGO
- Other:

Question 4

Please indicate your position within your company / organisation / department by checking the corresponding box(es).

Check any that apply

- Executive board
- Management
- Category manager
- Marketing & communication
- Environmental / sustainability manager
- Product development
- Advisor
- Policy officer
- Other

Question 5

Did you know about the EU Ecolabel prior to this survey?

- Yes
- No

Question 6

Would you support the introduction of the EU Ecolabel in the food, feed and drink sector or not? Please explain your position in detail.

No, EEB and BEUC and their member organizations are not in favor of extending the scope of the EU Ecolabel scheme to food, feed and drink. First, applying the EU Ecolabel to food products would increase the risk of creating a duplicate of organic certification as the EU organic label already exists. An overlap between an Ecolabel on food products and the organic label would be both misleading and confusing for consumers. For this reason we recommend integrating sustainability criteria with regard to processing, packaging and transport into the EU organic label criteria where applicable. Second, there are strong limitations on the practicability and effectiveness of applying the EU Ecolabel to food products. In fact, the environmental impacts of food production are complex and cumulate throughout the various stages of food

production. Conveying information on these different environmental impacts in a single, understandable label would be close to impossible.¹ Moreover, such a stand alone label would not provide information that would allow consumers to differentiate between products and therefore would not communicate added value to consumers and consequently to environment. Instead of accurately informing consumers of the environmental impacts of food products, it might create further confusion and incoherence thus impeding rather than helping informed choice. With the 400+ different logos/labels currently being used on food products across the EU, the ecolabel could be seen as just another in a proliferation of labels. For us the focus should be on strengthening/expanding the criteria behind those logos already recognised and used by consumers most notably the organic logo.

Question 7

What do you think would be the advantages and disadvantages of introducing the EU Ecolabel in the food and feed sector?

The disadvantages have been described above. We do not see advantages as currently the EU Ecolabel applies only to non-food products and the EU organic label applies to food products. As consumers are informed about this separation, we recommend keeping the different label schemes for non-food and food products.

Question 8

If introduced in the food and feed sector, which sustainability issues should the EU Ecolabel include? Please check the respective box(es).

- Greenhouse gas emissions
- Ozone layer depletion
- Water usage
- Water pollution
- Acidification
- Biodiversity and wildlife
- Transportation (food miles)
- Eco-toxicity and pesticide use
- Deforestation
- Waste / development of recycling systems
- Non-renewable energy use
- Soil erosion
- Human toxicity

¹ Effective approaches to environmental labelling of food products, DEFRA, 2010.

- Animal welfare
- Climate protection
- Fair producer prices
- Minimum labour standards for workers
- Other: case-by-case approach needed

Question 9

Do you have further comments on the sustainability issues you chose or suggested?

When the Ecolabel Regulation was revised, we pointed out that the number of environmental parameters to be considered by the Eco-label should not be limited and that the Eco-label must remain a scheme which covers all major environmental impacts over the life-cycle of products. In addition, Eco-label criteria have to meet the expectations of consumers and take account of their values. For instance, it can be that other issues than environment, e.g. social and health issues could become of high importance for consumers. A product which would have a very good environmental performance but would have been produced e.g. on the basis of unacceptable working conditions would fall short of consumers expectations.

With regard to the question which criteria should be integrated in a possible Ecolabel for food, we suggest looking at all the mentioned criteria on a case by case basis.

Question 10

Please indicate your position on the following statements.

	Strongly agree	Somewhat agree	Neither agree nor disagree	Somewhat disagree	Strongly disagree
Consumers would confuse a possible EU Ecolabel with organic labels.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The EU Ecolabel in the food, feed and drink sector will contribute to the protection of the environment.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are already too many label schemes in the food and drink sector.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are already too many label schemes in the feed sector.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
I think that potential consumer confusion between 'Eco' and 'organic' (ecological) harms the organic sector.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
We think that potential consumer	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Strongly agree Somewhat agree Neither agree nor disagree Somewhat disagree Strongly disagree

confusion between 'Eco' and 'organic' does not matter as long as introducing the EU Ecolabel in the food, feed and drink sector increases the turnover of environmentally friendly products.

The current labelling landscape in the food and drink sector is sufficient to reward companies for high environmental performance.

The current labelling landscape in the feed sector is sufficient to reward companies for high environmental performance.

Instead of ticking the boxes above, we just want to point out that there are too many labels covering the food, feed and drink sectors which, contrary to their aim of informing, actually cause confusion among EU consumers. With current estimates that there are over 400 different logos/labels on food products alone, we call for a harmonised approach to labelling be it nutrition, organic, quality or other which would help consumers to make informed choices. However, as an EU Ecolabel for food, feed and drink does not exist yet, it is difficult to assess clearly consumers' perception.

Question 11

There are different views on the potential confusion and detrimental effects of a possible EU Ecolabel for food, feed and drink products in relation to organic labels. What is your position on these matters?

See our reply to question 15

Question 12

If any, who do you think would particularly benefit from the introduction of the EU Ecolabel in the food, feed and drink sector?

- Conventional food, drinks and feed sector
- Organic food, drinks and feed sector
- Other non-organic food, drinks and feed sector
- Feed for livestock sector
- Consumer
- I don't know.
- Other

Question 13

If any, who do you think would be particularly disadvantaged by the introduction of the EU Ecolabel in the food, feed and drink sector?

Check any that apply

- Conventional food, drinks and feed sector
- Organic food, drinks and feed sector
- Other non-organic food, drinks and feed sector
- Feed for livestock sector
- Consumers
- I don't know
- Other - Consumers, as the introduction of Ecolabel for food, feed and drink products will create confusion among them.

Question 14

We would like to understand the difficulties associated with the actual implementation of the EU Ecolabel in the food, feed and drink sector. If possible at all, what conditions should be met to successfully introduce the EU Ecolabel for food, feed and drink products?

We are against introduction of the EU Ecolabel for food, fee and drink products.

Question 15

Many food products are marked with a range of different labels, such as recycling symbols, national, private and EU organic labels, fair trade label, MSC, etc. What is your position on the following statements?

	I strongly agree	I rather agree	I neither agree nor disagree	I rather disagree	I strongly disagree
The EU Ecolabel is distinct to existing labels.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel can only be successfully introduced in the food, feed and drink sector if accompanied by a large-scale information campaign.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel will go under in the flood of existing labels and will not be recognised by consumers.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
The EU Ecolabel will help consumers identify environmental friendly produced products at the	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	I strongly agree	I rather agree	I neither agree nor disagree	I rather disagree	I strongly disagree
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point of sale.

The EU Ecolabel will have a significant impact on consumers' product choice.

As 'Eco' is the legal name for 'organic' in several European countries, the terminology of the EU Ecolabel needs to be changed.

We would not like to give an opinion here because it is not possible to give an opinion on a scheme which does not exist yet.

Question 16

Do you have any further comments on the previous questions?

No.

Question 17

Please choose up to three scenarios that you agree with the most by using the following ranking 1=best scenario, 2 = second best scenario, 3 = third best scenario.

The EU Ecolabel...

Your choices:

- ... will not be used in the food, feed and drink sector.
- ...will be used for organic and conventional products.
- ...will be introduced for specific products not covered by organic labelling schemes.
- ...will be introduced only for specific focus areas in processing, distribution, storage or packaging.
- ...will be introduced for specific hotspots not covered by existing labelling schemes.
- ...will be introduced only for organic products on the basis of additional environmental standards.
- ...will be introduced as a Business-to-Business label scheme only.
- ...will be introduced into the eating-out sector only.
- ...will be introduced only into the feed for livestock sector, but not in the food and drinks sector.

The EU Ecolabel...

- will not be used in the food, feed and drink sector
- will be introduced for specific products not covered by organic labelling schemes
- will be introduced only for organic products on the basis of additional environmental standards

Question 18

Please explain your chosen preferences in more detail.

- 1) We think the EU Ecolabel should not be used in the food, feed and drink sector (see our answer to question 14).
- 2) It could be introduced for certain products which are not covered by organic labelling schemes only under the following preconditions:
 - these products cannot be integrated into organic labelling schemes;
 - the criteria would cover all environmental aspects and would cover the whole life-cycle;
 - only 10-20% of the best performing products available on the market will be eligible to apply for the scheme;
 - the label will not mislead consumers about the performance and characteristics of these products.
- 3) Ecolabel criteria could be integrated into organic products with regard to the processing, packaging and transport of these products. However, the Ecolabel should not be visible on the product itself in addition to the organic label as it will confuse consumers. This would in particular be the case if the Ecolabel would cover only parts of the life-cycle and the organic label some other parts of the life cycle.

Question 19

Do you have further comments or recommendations?

No.

End.