



EUROPEAN FEDERATION OF THE TRADE IN DRIED FRUIT & EDIBLE NUTS • PROCESSED FRUIT & VEGETABLES • PROCESSED FISHERY PRODUCTS • SPICES • HONEY

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## FRUCOM reply on methodology for substantiating environmental claims

FRUCOM represents EU importers and growers/processors/traders in origin countries of nuts, dried fruit, seafood and processed fruit and vegetables.

Many of these products are either not produced in the EU or the production volume is not sufficient to meet the market needs, hence the need for imports. Sourcing is global, from both developed and developing countries.

**FRUCOM is in favour of option 2: a voluntary EU legal framework enabling companies to make green claims in accordance with the Environmental Footprint methods, as a complement to existing methods (developed by private or public entities, at national or international level).**

**The communication of any results to consumers and other parties should remain voluntary.**

Before considering compulsory EU legislation in this field, it is in our view important to analyse the following issues:

### On the green claims:

- We welcome the initiative to agree on a clear, specific, unambiguous and accurate way for companies to make green claims. The PEF methodology is very useful for understanding the supply chain, designing product/supply chain improvement and facilitating supply chain collaboration.
- However the information gathered in a PEF is very complex. We are concerned that not all information can be translated through a claim to consumers and might leave them even more confused. Frucom would recommend to analyse how this information can be translated into clear, comprehensible claims/labels that also do reflect the full scope of the PEF information.
- The use of the PEF methodology as a green claim is not always appropriate given the changing character of some supply chains. It is known that the origin of products (and therefore producers) can change rapidly according to different factors like seasons, availability, price, etc. Therefore keeping on product labelling for these kind of products up to date might be challenging and will lead to extra costs. This is an extra reason why Frucom is more in favour of a voluntary scheme.

### Integration or recognition of standards:

- Many of our suppliers have sustainability programmes and importers must meet requirements by the supermarkets, including via certification. In this way, many efforts and achievements are already there. The integration among robust schemes should be considered.
- We take note that the Commission intends to “analyse the interactions with existing labels regulated at EU level (e.g. EU Ecolabel, organic label, etc) and other environmental labels, including



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officially recognised ISO 14024 type 1 ecolabels at Member State level (e.g. Blue Angel)”. What about the norms outside the EU?

- Moreover, a lot of standards have incorporated both environmental, social and good agricultural practices criteria in their standard (e.g. fairtrade, UTZ). These standards are widely used and known by customers. How can these labels be translated into common green claims without the risk of losing essential info on social and other criteria to the consumer?
- How will the EU consider standards that make claims that are not covered by the PEF methodology, like claims on biodiversity?

#### **Likely economic impacts, costs and competitiveness, including for SMEs:**

- The Commission recognises that additional costs and fees can be expected for businesses that apply the scheme, if they make a choice to use a green claim. “The Impact Assessment will assess these costs and fees for both situations when a PEFCR/OEFSR is available or when studies are carried out based on the PEF/ OEF methods. The administrative burdens related to the proposals would be minimised by focussing reporting on issues that are relevant for the given product or sector and necessary and proportionate for the tool used; by introducing a single reference instead of allowing a proliferation of policy or de facto requirements on Member States markets; by providing access to free data; by providing a basis for developing easy-to-use calculation tools”. These are welcome proposals, but more concrete information on costs and easy-to-use tools should be in place before compulsory application is considered.
- What about the implementation of the EU methodology for SMEs?
- Implementing PEF methodology requires a lot of knowledge and resources. The use of PEF methodology will require technical assistance. Does the EU consider any support measures?

#### **Geographic and product coverage:**

- At the moment, the pilot studies exist for beer, wine and pasta, the only three among food and drink products. According to the Commission, the future impact assessment “will consider the need to introduce a way to prioritise the development of product- and sector-specific approaches (PEFCRs and OEFSRs)”. Until a large variety of products is covered, it is in our view premature to require compulsory PEF application.
- Specifically for fisheries, both retail and operators widely use standards on environmental sustainability (state of stocks and marine environment). Are these standards recognised in the context of the PEFs methodology?
- Many products are sourced from outside the EU. What about the implementation of EU methodology in non-EU countries? Depending on the volumes sourced, some producers might not be willing to make additional costs and efforts related to PEF. This might result in unfair competition. Does the EU consider methods to help producers in non-EU countries to get on board with PEF methodology.
- It has already been acknowledged that data collection is a difficult point within the PEF methodology. This is even more the case for long, complex, fragmented and global supply chains. Many of the producers are smallholders situated in the global South. Frucom recommends executing more international pilot studies for food products to be able to assess the capacity of these actors to implement the requirements.

**Application of PEFs:**

- The timeline for the possible compulsory use of the PEFs, considering significant adaptation time required?
- Who will bear the cost of adaptation? Changing standards requires re-audits. Usually these costs are inflicted on producers that are already suffering from high auditing costs. Frucom recommends that transition periods to integrate the PEF methodology in standards take into account natural audit cycles in order to not inflict additional costs on the producers.