



Position Paper

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EDA position on substantiating green claims and PEF

EDA supports the use of the Product Environmental Footprint (PEF) methodology to substantiate green claims in the EU. We support action by the EU Commission to integrate the PEF into existing or new policy instruments, to reward sustainable practices and limit the risk of credibility loss that the proliferation of green claims may cause.

Main position points

- The PEF methodology provides a harmonised approach for substantiating green claims in the EU
- We favour a voluntary-mandatory approach: communication on the environmental performance of a product should be voluntary, but once a claim is made, it has to be substantiated by PEF (for the impact categories covered by the PEF method)
- We favour the communication of at least the 3-5 most relevant impact categories. Absolute and aggregated values can be misleading for consumers and other stakeholders
- In case a PEFCR exists, we believe it is important to also compare the environmental performance of the same product over time, in order to show improvements
- Comparison between products from different categories and subcategories should not be allowed
- It is important that verification is done by experts that understand the specificities of each sector, as well as the situation in each Member State
- Coherence with other existing schemes and EU labels (e.g. EU Ecolabel and Organic logo) should be ensured
- Digital means of providing green claims should be explored
- Market actors should be free to claim and communicate the other environmental performance criteria not covered by PEF via other methods (e.g. specific claims relating to packaging)

In detail:

We believe the PEF should be the answer to the many issues the Green Deal and the EU environmental legislation aim to tackle, assuring a harmonised and realistic approach for all actors involved.

To enable meaningful consumer choice, any type of information provided needs to reflect the complexity of the product and its production chain/process. Valuable consumer information needs to enable consumers to easily make responsible and confident decisions. This means that information needs to be understandable to informed consumers and unequivocal from a scientific perspective, as well as coherent with the overarching goal.



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To ensure the credibility of green claims, a harmonised voluntary system needs to have a clear framework and should only be applied where feasible and relevant.

We favour a voluntary-mandatory approach: communication on environmental performance should be voluntary but conditioned to the PEF methodology (and based on a sector-specific PEFCR, if available). As has always been the aim of the PEF this would ensure that any green claims made are valid, that comparability is restricted, and that assurance can be provided by the competent authorities required to enforce this.

EDA also supports the use of the PEF for assessing improvements in the environmental performance of a same product over time (ideally with a timeframe of more than one year).

Due to uncertainties that persist in the methodology, it is not meaningful and realistic to compare products within the same category. We also ask for a clear prohibition and enforcement of comparative claims between products of different categories. The PEF is not meant to compare products from different categories also because relevant aspects of concern, e.g. regarding health, quality, and nutritional value are not included in its scope.

Furthermore, we believe it is of paramount importance to indicate at least 3 or 5 impact categories when communicating environmental information, to have a clear and transparent picture of the overall environmental performance of a product and avoid negative trade-offs between environmental categories. We also believe that, whenever possible, off-pack means for providing environmental information should be preferred (e.g. digital means such as QR codes).

It is also important that complementarity and coherence with other existing schemes and EU labels (such as EU Ecolabel and Organic logo) is ensured.

Moreover, market actors should be free to claim and communicate other environmental performance criteria not covered by PEF via other methods (e.g. specific claims relating to packaging).

EDA and the Dairy PEFCR

The Dairy PEF, conducted by EDA and approved by the EU Commission and Member States in 2018, is a fundamental tool for driving environmental sustainable practices in the dairy sector and allowing to quantify the improvements, covering a broad list of environmental indicators. It represents the holistic and proactive approach taken by the sector in the field of environmental assessment and is currently the best way to provide environmental information in a credible and measurable way, while being always further refined to integrate more indicators. Jointly with other measures (e.g. nutritional content) it is a helpful tool to describe all benefits of food and the effort of producing high quality food. The Dairy PEF as it stands now is a good method for improvement calculation over time and internal assessment, as well as business-level relationships. It could thus be used for voluntary off-pack information to stakeholders. It is not ready to allow for meaningful and quantitative comparability between products, nor on-pack labelling.



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EDA factsheets and position papers:

EDA positions on policy applications of the PEF and EU product policy -> [Click here](#) and [here](#)

EDA Factsheet on the Dairy PEF Project -> [Click here](#)

EDA paper "The Dairy Sector and the Green Deal" -> [Click here](#)

EDA Dairy Sustainability Synopsis -> [Click Here](#)