



EU Environment Policy Group supporting High Level Group on Competitiveness of the Agro-Food Industry

Tetra Pak¹ contribution

Brussels, 29 August 2008

Introductory remarks

Tetra Pak welcomes the opportunity to provide comments in response to the questions and issues raised at the Environment Policy Working Group meeting held on 15 July. We would in particular wish to focus our remarks on two of the five areas pinpointed by the Group, namely:

- Food-miles and carbon / CO₂ footprint
- EU Packaging waste policy

1 “Food-miles” and the carbon/ CO₂ footprint: views and clarifications

The escalating priority accorded to the CO₂ footprint in today’s public debate can on occasion lead to confusion. Tetra Pak believes some clarifications may be useful. First, to equate food miles with the CO₂ footprint appears to be an oversimplification. Food miles may of course be a factor in the footprint but they are not the only one and may not be the most significant².

Second, as regards the use of the CO₂ footprint in the food and food packaging sector, a distinction should be made. Whereas for food products as such, the footprint may be a simplistic indicator of sustainability (although that is for the food and retail sector to judge), it does remain a valid indicator for food packaging. Indeed, a range of life cycle assessments tell us that climate impact is a robust and leading indicator for measuring and benchmarking the environmental performance of packaging³.

At the same time, the measurement of the CO₂ footprint needs to be handled in a coordinated and scientifically coherent way. Otherwise there is the risk of confusing consumers about the meaning of the footprint, and therefore the risk of undermining the credibility of a tool that enables us to communicate progress in tackling climate challenge.

In recent months there has been a range of standardization efforts in different Member States. While welcoming the objectives of these efforts, Tetra Pak strongly supports European guidelines and standards to avoid uncoordinated national measures. Multiple compliance with differing standards would create additional costs without matching environmental gains.

¹ Tetra Pak input as leading company in packaging and food processing equipment. Read more on www.tetrapak.com

² See CIAA Report Managing Environmental Sustainability in the European Food and Drink Industries, 2007

³ For examples, see http://markets.tetrapak.com/climate/content/frset_main.asp?navid=184

In this respect, Tetra Pak believes the Commission has a role to play in two key ways:

a) Drive the development of a harmonized standard for determining the CO₂ footprint based on internationally agreed Life Cycle Assessment (LCA) rules and principles. Among other things these standards should require:

- a life cycle approach and compliance with existing standards, particularly ISO standards on LCA and labeling
- a scientifically robust fact-base
- the use of internationally accepted metrics for selected key parameters, enabling measurement of the main environmental impacts of packaging (e.g. grams of CO₂ equivalents emitted per unit)
- cooperation with relevant stakeholders in defining the CO₂ footprint.

Tetra Pak – through its membership of ACE⁴ – supports the European Platform on Life Cycle Assessment (LCA)⁵, which is to make available sector average data for measuring the CO₂ footprint.

We would also recommend the Commission to develop in cooperation with stakeholders an EU-wide database for CO₂ footprint and LCA data.

b) Rules on communicating the CO₂ footprint

Great care needs to be taken to ensure that communication is meaningful but not simplistic and therefore misleading. In the (liquid) food packaging sector, it could add yet another label to existing labels. Among potential points of confusion: does the label refer to the CO₂ impact of the package, of the packed product, or of both? Can a claim related to a quantified CO₂ impact be meaningfully judged by a consumer? Ultimately, these are questions for the food and retail sectors. Whatever the rights and wrong of CO₂ labelling, it does seem sensible to ensure that the outcome is credible and comparable.

In our view, quantitative CO₂ footprint figures for packaging will be communicated through the business value chain. In our case, this means communicating our CO₂ footprint downstream to customers, retailers and eventually to consumers, and requiring suppliers to communicate to us their footprints. To guarantee its credibility, both business-to-business communication and communications to consumers should be third-party verified according to internationally harmonised standards.

⁴ Alliance for Beverage Cartons and the Environment, www.beveragecarton.eu

⁵ See EU Platform on LCA: <http://lca.jrc.ec.europa.eu/EPLCA/>

2 EU packaging waste policy: effective implementation of existing legislation is key to environmental benefit

Packaging, from the early days of EU environment policy, has been a leading focus of measures aimed at reducing environmental impact. A Commission report⁶ on the implementation of the Packaging & Packaging Waste Directive (Directive 94/62/EC as amended by the Directive 2004/12/EC) illustrates this. It shows the extent of environmental benefit that has accrued as a result since then: high levels of packaging recovery and recycling across the EU. Targets have been achieved through the development of an efficient infrastructure (e.g. recovery organizations) funded by high levels of stakeholders' investment. Recycling and recovery of packaging waste have led to positive environmental effects on most parameters: greenhouse gas savings of around 25m tons of CO₂ equivalents, and resource savings of 10m tons oil equivalent. The "new approach" (essential requirements, CEN standards) taken by the 94/62/EC Packaging Directive has in our view been successful and should be pursued in the future.

To build on the Directive's achievements, Tetra Pak believes the emphasis should be put on its effective implementation in the following three main areas:

- **Recycling targets**

Over the next few years, efforts should be devoted to ensure all EU 27 countries reach levels of recovery and recycling which meet EU targets. To help achieve this, collection systems have a critical role to play. In some countries the way in which these collections systems are organized and work leaves room for improvement. In this regard, Tetra Pak would welcome specific EU guidelines for the authorization of recovery schemes by Member States. Financial support for recovery infrastructures might also have a role to play in certain cases.

- **Essential requirements on prevention**

Source reduction, besides its environmental benefits, can be a key contributor to profitable growth. Industry has made significant progress in this area while complying with the essential requirements – which mandate packaging minimization to the level adequate for the product, minimization of hazardous substances and a limit on the concentration levels of heavy metals in packaging – as well as implementing the CEN standard on prevention (EN 13428) for product development.

However, a word of caution is needed. Single-minded pursuit of packaging minimization can be counter-productive, particularly if it exacerbates food waste (e.g. food is sometimes offered in too large portion packs and much is often thrown away⁷). This concern might usefully be

⁶ Commission report on the implementation of Directive 94/62/EC on packaging and packaging waste and its impact on the environment, as well as on the functioning of the internal market, COM (2006) 767 final

⁷ UK WRAP study on food waste

http://www.wrap.org.uk/retail/food_waste/research/the_food_we_waste.html

addressed in the tool-kit on food and catering services which the Commission has prepared in the context of its green public procurement policy where it recommends that packaging should not be supplied in individual portions⁸.

Finally, it is worth noting that only three of the EU 27 have enforcement mechanisms in place for essential requirements and the related CEN packaging standards, meaning that in most countries there is no effective way of monitoring compliance⁹.

- **Ensuring national laws implementing the directive do not infringe internal market principles**

A range of measures, particularly in the fiscal area, whose link to environmental benefits may sometimes be unclear, have been introduced by Member States. Such measures can obstruct the proper functioning of the internal market. To prevent this, and in particular to prevent the fragmentation of the single market for packed goods, there is a role for the Commission to develop guidelines or criteria for the application of fiscal measures by Member States. We would also welcome strengthening of the infringement notification procedure and making it more agile and transparent to all stakeholders, so as to ensure effective policing of Community law¹⁰.

⁸ Source reduction and portion packs - GPP toolkit on food and catering services:
http://ec.europa.eu/environment/gpp/pdf/toolkit/food_GPP_product_sheet.pdf

⁹ Perchards report on the CEN packaging standards:
http://ec.europa.eu/enterprise/environment/reports_studies/studies/report_packaging_direct.pdf

¹⁰ Read more: EUROPEN position papers on Internal market principles and better regulation on www.europen.be (key topics>Internal market principles and better regulation) and the EUROPEN booklet on Economic instruments in packaging and packaging waste policy: www.europen.be (Publications> Economic instruments in Packaging & Packaging Waste Policy)