

Opinion of the European Union Ecolabelling Board:

On the development of EU Ecolabel for food and feed products.

Background

Article 6 (5) of the Ecolabel Regulation:

Before developing EU Ecolabel criteria for food and feed products...the Commission shall undertake a study...exploring the feasibility of establishing reliable criteria covering environmental performance during the whole life cycle of such products, including the products of fishing and aquaculture. The study should pay particular attention to the impact of any EU Ecolabel criteria on food and feed products, as well as unprocessed agricultural products that lie within the scope of Regulation (EC) No 834/2007. The study should consider the option that only those products certified as organic would be eligible for award of the EU Ecolabel, to avoid confusion for consumers.

*The Commission shall decide, taking into account the outcome of the study **and the opinion of the EUEB**, for which group of food and feed, if any, the development of EU Ecolabel criteria is feasible, in accordance with the regulatory procedure with scrutiny referred to in Article 16(2).*

Opinion of the European Union Ecolabelling Board:

- The EUEB broadly supports the findings of the *EU Ecolabel for food and feed products – feasibility study*¹, noting in particular:
 1. In general, for food products, the primary production stage is responsible for the most significant environmental impacts over their lifecycle, although this is not always the case;
 2. There is a significant gap in the labelling landscape of food, in that most existing labels do not consider the processing lifecycle stage of such products in their criteria;
 3. Consumers would expect an environmental label for food to be organic and to cover, not only environmental issues but also social and ethical issues;
 4. There is already significant consumer confusion in relation to the number of environmental labels already on food products;
 5. Developing and verifying Ecolabel criteria for food would be complex, resource intensive and costly;
 6. If the EU Ecolabel were placed on food products without a significantly resourced communications campaign, it could cause consumer confusion about the meaning of the label, particularly given the use of the word 'eco' in relation to organically certified products;
 7. A majority of key stakeholders do not support the extension of the EU Ecolabel to food products.

¹ http://ec.europa.eu/environment/ecolabel/about_ecolabel/pdf/Ecolabel%20for%20food%20final%20report.pdf

- Therefore, given the likely difficulties, costs, stakeholder opposition and possibility for confusion, the EUEB does not support the development of EU Ecolabel criteria on food, drink and feed in the immediate future;
- However, it also believes that there is a need for much better information to be made available for consumers in terms of the sustainability of the food they buy, and that the Ecolabel could still potentially have a role to play in this regard if the barriers identified by the feasibility study (i.e. points 3, 4, 5 & 6 above) can be overcome.
- The EUEB considers that an alternative approach to providing this information could be to amend the Organic certification (i.e. the scope of *Regulation (EC) No 834/2007*) to cover the full life cycle of food products, including the processing and packaging and calls on the European Commission to give due consideration to this option, to improve the performance of the existing Organic Regulation;
- The EUEB therefore recommends that the option for the EU Ecolabel to cover food, drink and feed products should not be permanently dismissed but should be placed on hold until after the publication of the Communication on Sustainable Food being prepared by the European Commission for 2013 when the barriers identified by the feasibility study will be reassessed;
- It therefore calls on the European Commission to draw on the conclusions of the feasibility study when considering the possible role of the EU Ecolabel within the framework of a wider EU food strategy over the coming years, in particular in light of developments in methodologies, and other tools, for accurately measuring the environmental impact (including by, for example, environmental footprinting) of products.
- In addition, the EUEB stresses that this opinion does not apply to retail or food related services, such as restaurants and catering, which could be valuable candidates for the development of Ecolabel criteria.