

Reaction of the EIPRO project team on comments by CIAA

1. Extract of comments: Page 5: [...Given the demonstrated complexity of the food supply chain, the necessary sharing of responsibility between actors along the food chain, the highly interrelated nature of food and drink products making one food product an ingredient of another food product both at the production and consumption phase of the life cycle, it is evident that the EIPRO study adds little valuable information to already existing knowledge and industry practice. At the high level of aggregation, the importance of functional areas such as transport, housing and food consumption has been known for many years as these areas cover the main categories of human activity. At the low level of aggregation, the EIPRO report due to its numerous methodological weaknesses proves incapable of providing scientifically valid information on the environmental impact of specific products and the relevance of individual actors along the food supply chain. If one assumes that EIPRO-report with all its methodological shortcomings is the best available research tool currently available, it becomes evident that the academic approach towards IPP as currently applied by the Commission does not help to further improve environmental performance of food and drink products and processes...]

Reaction: Indeed the food supply chain consists of many closely cooperating actors and that many regulations/considerations influence the supply chain. But this equally holds for all other supply chains. Improving environmental performance of the food supply chains would require a careful analysis of this chain as to improvements options and impediments to them. EIPRO does not deal with this issue. But this does not justify the conclusion that EIPRO adds little valuable information. On the contrary, we think that EIPRO provides valuable base information by analyzing the environmental performance at a higher level of aggregation without going into the details of specific products/services, and specific technologies to produce them. In analysing improvement options, such more detailed studies of course would have to be available.

2. Extract of comments: Page 6: [...

- Given the specific characteristic of food & drink products ingested by the consumer compliance with highest safety, nutrition and health requirements constitutes the overriding responsibility of the food & drink industry vis-à-vis the consumer. Any interference with these principle objectives is therefore unwarranted.*
- The specificity of food & drink products is reflected in extensive legislation covering food products at the EU and national level (regulations on food safety, hygiene, contaminants, additives, GMOs, etc.). Mandatory IPP tools would run the risk of interfering with already existing legislation at the expense of the consumer.*

NB. The views expressed in this document are solely those of the EIPRO project team. The document must not be regarded as stating an official position of the European Commission services or any of the participating organisations.

- *Unlike with other consumer goods, no justifiable distinction can be drawn between green and non-green food and drink products. Since a balanced combination of all food and drink products constitutes an undisputed element of any healthy diet, a distinction based on strictly environmental considerations would unduly compromise the primary goal of providing the consumer with diversified and healthy foodstuff. The distinctive characteristic of mandatory IPP tools to discourage the consumption of individual products is therefore unsuitable for food and drink products.*

In order to avoid the interference of IPP tools with the overriding objectives of health, safety and nutritional needs of the consumer, CIAA considers mandatory IPP tools as unsuitable instruments for addressing the complex food supply and consumption chain. Food and drink products should therefore be excluded from the scope of mandatory IPP tools...]

Reaction: Of course there are many overriding principles, like food safety, next to environmental performance. Such principles of possible overriding importance can be found in any supply chain, for instance with safety of cars. Does it mean that we should not measure environmental performance of the food supply chain in relation to other consumer supply chains? If we don't do so, there is no rationale to distribute the burden for environmental improvement over the diverse industry sectors. Moreover, environmental policy measures would be taken without knowing their effectiveness, leading to inefficient measures which in turn would harm both European industry and the environment.

3. Extract of comments: *Page 9: [...Given the numerous admitted weaknesses of the CEDA-EU25 model, it is obvious that this model constitutes an unreliable tool, from which no scientifically valid conclusions can be drawn for public policy making...]*

Reaction: As extensively discussed in the report, in the EIPRO model there are issues that can be improved. It is the strength of the EIPRO model that we can fully discuss these issues in a transparent manner without compromising the results of the study. Do these issues affect the result of the EIPRO model in such a way that they are unsuitable for the purpose of the study? The answer is 'no'.

4. Extract of comments: *Page 10: [...CIAA raises concerns regarding the general EIPRO-approach of identifying green versus non-green products. This limited approach neglects not only the economic and social pillars of sustainable development, but also all other important characteristics of a product, including quality, health, nutritional value, safety, convenience, consumer choice, etc...]*

Reaction: The report does not label products as green, or not, but states their environmental effects. Nowhere is it stated that other aspects are of lesser, or higher, importance, nor are there any policy recommendations in the report, as these relate to

<p>NB. The views expressed in this document are solely those of the EIPRO project team. The document must not be regarded as stating an official position of the European Commission services or any of the participating organisations.</p>
--

variations and improvability, with of course many constraints from other considerations, including health, cost, etc

5. Extract of comments: *[...The over-ambitious scope of the EIPRO study in combination with a mix of different questionable methodologies produces a shady patchwork of data that fails to identify environmental impacts of specific products and the relevance of individual actors along the food supply chain. EIPRO thereby disregards the fact that the food supply and consumption chain consists of numerous actors and different spheres of influence and responsibility. The appropriate allocation of responsibility to each stakeholder involved in the supply chain is an essential element that the EIPRO study completely fails to address due to its methodological weaknesses. The EIPRO approach is therefore incapable of producing the product-specific information required for concrete policies or industry action. The EIPRO-report itself admits that the model is lacking in detail required for specific policies ...]*

Reaction: The EIPRO report does not state in any way who should be responsible for which part of the production chain, as this is not an analysis subject. The survey given indicates where policies might have a substantial environmental effect, per Euro of product or for the volume of consumption as a whole. More detailed studies will always be required to support specific actions, as in supply chain management or in public policies.

NB. The views expressed in this document are solely those of the EIPRO project team. The document must not be regarded as stating an official position of the European Commission services or any of the participating organisations.
