



Position Statement

2023
February

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EDA position on the upcoming legislative framework on green claims

EDA is in favour of a legislative framework regulating claims on the environmental performance of products in the EU and promoting the use of the PEF methodology to substantiate such claims

Scope

We acknowledge the wish of the European Commission to set specific requirements on how green claims should be substantiated in the European Union.

We believe that the use of the Product Environmental Footprint (PEF) methodology and its sector-specific application (PEFCR – Product Environmental Footprint Category Rules) should be incentivised for validating environmental claims. The methodology encompasses a life-cycle analysis of the environmental footprint of products across a broad range of environmental components, and represents an holistic approach in environmental footprinting.

In case different methodologies/schemes are used, we would support the objective of not establishing any new environmental label without the approval of the European Commission.

Comparison rules

Comparison should be restricted within the same category of products, or within one product and the benchmark (as allowed by PEFCR), not between products from different PEFCR. In the case of food, we believe that a PEFCR should be used to show consumers the most environmentally friendly food item on the shelf, not the most environmentally friendly food item in the supermarket.

We call the European Commission to clarify such rules on comparison in the future legislative proposal.

Coherence and consistency with other policy framework

Coherence and consistency with existing and future policy frameworks should be ensured, especially with regards to the Unfair Commercial Practices Directive, the framework on carbon removals, the framework on empowering consumers for the green transition, the Packaging and Packaging Waste Regulation and the future Framework on Sustainable Food Systems.



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The Dairy PEF

The Dairy Product Environmental Footprint (Dairy PEF) has been driven by the European Dairy Association (EDA) as a major project to better identify the most relevant environmental impacts of different dairy products in examining a broad array of environmental criteria. It covers the full life cycle (cradle to grave) for dairy products. The Dairy PEF is the result of a global industry effort and has received recognition by the European Commission, EU Member States and a wider array of stakeholders.

The Dairy PEF aims to provide a harmonised approach for measuring environmental performances of products and should be used as an improvement tool for the performance of the overall sector. It attests the European dairy sector's continuous effort for improving not only its economic performance, but also its long-term sustainability.

EDA support the use of the PEF methodology and its sector-specific application (PEFCR) for validating claims on the environmental performance of products in the EU.

Environmental footprinting and nutritional aspects

Assessing the nutritional value and dietary context is critical for foods, when calculating their environmental performance.

Relevant documents

- [Product Environmental Footprint Category Rules for Dairy Products](#)
- [EDA factsheet on the Dairy PEF](#)

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