ACE's Contribution to the European Commission's Consultation on Sustainable Consumption & Production (SCP) and Sustainable Industrial Policy

Please find below the response by the Alliance for Beverage Cartons and the Environment (ACE) in the context of the Commission's consultation.

1. Introductory statement

ACE welcomes the forthcoming EU Action Plans on sustainable consumption and production and on sustainable industry policy, and the opportunity to give its views on them. The Action Plans can, we believe, make a real contribution to the EU's climate change strategy and, more specifically, to helping the transition to a low carbon economy. They can provide support for an EU policy framework which will help encourage the take-up of low carbon practices in the European market place for goods and services. These new policies should in particular promote energy efficient products and services with a low carbon footprint in order to reduce CO_2 emissions. Measuring progress in these areas and communicating low carbon footprint to the market place are key challenges of this exercise and are integral parts of our commitment to it.

The Alliance for Beverage Cartons and the Environment[1] is the voice of the beverage carton industry chain. Its members are committed to running their business in an environmentally sound way and to take systematic steps to further reduce their environmental impact, particularly the carbon footprint of their operations and products along the life cycle.

This paper reflects ACE's current state of thinking on these issues. We look forward to making further contributions as the EU's policy-making process develops.

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2. Overall approach to a sustainable low carbon economy

ACE welcomes the approach outlined by the Commission including the setting of advanced performance benchmarks (or "lead" standards) coupled with minimum requirements (or minimum standards). We believe it is a workable approach for packaging.

In our view, the lead standard should be voluntary, in the sense that market operators should be free to opt to apply it or not. However, the rules governing the contents, application and use of the lead standard need to be clear and mandatory (e.g. standard must be science-based, third-party verified, and use metrics relevant to key selected parameters). There must be a guarantee that operators choosing to use the standard commit to the same set of credible requirements.

2.1. Setting performance benchmarks for packaging

In our view, the minimum standards for packaging already exist. EU Directive 94/62 on Packaging and Packaging Waste defines minimum environmental requirements in the form of the Essential Requirements specified in the harmonised CEN packaging standards. These standards already set benchmarks in a number of areas - in prevention by source reduction (EN 13428), recycling (EN 13430) and recovery (EN 13431). They do not, however, include areas like resource efficiency, sustainable sourcing or carbon footprint – and these are areas which could be considered for a lead standard.

A "lead" standard for packaging could focus on a few performance indicators selected to reflect the areas of high EU environmental priority. If the overall objective is to tackle global warming and to facilitate the transition towards a low carbon economy, a low carbon footprint for packaging would contribute to this transition. For example, for beverage cartons, on the basis of LCA studies, we measure the carbon footprint of our packaging in kg of CO_2 equivalent per 1000 litres of product packed. Measuring the carbon footprint would drive cleaner production along the value chain. Reducing further our carbon footprint would naturally improve the resource efficiency of the whole packaging chain.

A further possible lead indicator could be the sustainability of the materials used in the manufacture of the package. In our sector this would relate for example to the share of material sourced through certified chain-of-custody systems. Another lead indicator might be considered for resource efficiency

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(which could be measured in grams of material used in performing a specific function).

2.2. Key role of standardization

If a carbon footprint standard were to become the benchmark or lead standard for packaging, strict and harmonized rules would have to be applied:

- Standards should be written at international or at least European level;
- The methodology should be LCA-based (consistent with ISO 14040 and 14020 series of standard);
- Comparable data should be used. The EU LCA platform plays a key role in this context to strengthen the robustness, relevance and practicality of scientific data. ACE is an active member of the platform and will contribute relevant data;
- Third party verification is a must before allowing claims to be made;
- The standard should be defined in cooperation with relevant stakeholders.

3. The challenge of communicating environmental benefits

The key challenge will be to communicate effectively the benefits of highly complex performance standards both along the value chain and, also, to the end consumers. Simplicity will be key. Over-simplicity is a danger, risking the creation of market distortions. The challenge for effective communications lies in finding the right metrics and channels to communicate performance along the supply chain and, beyond, to a wider stakeholder audience including consumers.

3.1. Role of labelling schemes

Before defining new labelling schemes, one should learn from the failure of the past. In this area, the EU eco-label did not deliver the expected outcome and never received full consumer recognition. We do not see this type of labelling scheme as a good option for communicating the environmental profile of products.

If the carbon footprint becomes the key benchmark to assess the environmental impact of a product, ways of communicating it to the market place will need to be explored. A carbon label for packaging, based on the carbon footprint methodology (see above), could be a simple way to

communicate to the market place and would allow consumers to make informed choices.

However, labelling schemes for packaging developed in isolation from the packed product could create confusion for consumers and indeed might not be meaningful. We see carbon information for packaging as a key indicator to evaluate its environmental performance, but when it comes to food and drink products, other parameters (water, farming methods, etc.) may also need to be considered.

There might be more appropriate ways to communicate the environmental performance of a product than with an on-pack label. As an alternative, one could imagine a stakeholder platform (similar to the EU LCA data platform), which in cooperation with consumer organisations would develop possible tools (e.g. database) and criteria to ensure appropriate information to consumers.

The practical feasibility of a carbon label for food packaging would have to be evaluated by consumer groups and the food industry. However, as carbon labels and carbon footprints are already in use, we would ask the EU Commission to mandate CEN to develop an appropriate EU harmonized standard.

3.2. Harmonized rules on green claims

Clear EU rules on green claims should be developed. A starting point for that could be to build on the existing green claims codes developed in various Member Sates (e.g. the UK). Environmental claims should in particular refer to publicly available, third party verified data. In parallel, the Directive 2005/29EC on Unfair Commercial Practices should be strengthened to ensure that claims are not made which do not respect the EU harmonized criteria and rules of the type set out above.

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