



30 October 2008

ACE position on the Commission's Communication on the Action Plan on Sustainable Consumption and Production and Sustainable Industrial Policy

ACE welcomes the Action Plan on Sustainable Consumption and Production adopted by the European Commission on 16 July. It is an important policy framework for encouraging business and other stakeholders to respond coherently to the challenges of a low carbon economy.

The Action Plan provides a platform for the packaging sector, and perhaps for others in the packaged food chain, to make practical contributions to lowering the CO₂ footprint of products and services, and hence to increasing their sustainability. For packaging, scientific studies have recognized the climate impact as a leading indicator of its environmental performance*.

More specifically, ACE would make the following comments:

Greening business supply chains

ACE supports the emphasis put on this approach by the Commission. We agree that all stakeholders in a business value chain have a responsibility to make measurable and certifiable progress in greening their operations and products, and to ensure their suppliers do likewise. EU-level action which may help achieve this objective through standard-setting and benchmarking, should be considered. The notion of advanced voluntary benchmarks, also commonly referred to as "lead standards", raised in the preparation of the SCP, is noteworthy and merits further study. Given the framework of the EU's 500m single market, action at EU level is preferable to uncoordinated national measures.

* Some examples :

Analyses de Cycle de Vie des emballages de Tetra Pak, conducted by Bio Intelligence Service S.A.S, 2008, http://www.cartonpourlaterre.fr/img/synthese_ACV.pdf

Ökobilanzieller Vergleich von Getränkekartons und PET-Einwegflaschen (LCA of Beverage Cartons and PET One-Way Bottles), (2006); IFEU Heidelberg, commissioned by FKN, Wiesbaden.

Life Cycle Assessment for Drinks Packaging Systems II Phase 1, (2000); Prognos GmbH, IFEU Institut, commissioned by Umweltbundesamt (German Federal Environmental Agency), Berlin.

Peer reviewed LCA for German conditions. Results for 1-liter juice bottle (one-way glass). http://markets.tetrapak.com/climate/LCA/PDFS/UBA_II_part_1_english_summary.pdf

Life Cycle Inventory of Container Systems for Tomatoes, 2006, Peer-Reviewed Report, Franklin Associates, Division of ERG, Prairie Village, KS, USA

http://markets.tetrapak.com/climate/LCA/PDFS/FoodContainersPeerR_Report.pdf

Source: Life Cycle Inventory for Container Systems of Wine, Final Report 2006, Franklin Associates, Division of ERG, Prairie Village, KS, USA

http://markets.tetrapak.com/climate/LCA/PDFS/WineContainers_report.pdf



Credible standards for the carbon footprint

The leading environmental indicator in terms of climate change impact is the carbon or CO₂ footprint. Harmonized standards for determining the CO₂ footprint need to be credible and science-based. They should require:

- a life cycle approach (LCA) and compliance with existing standards, particularly ISO standards on LCA and labelling;
- a scientifically robust fact-base. On this the European Platform on Life Cycle Assessment has an important role to play in gathering data for measuring the CO₂ footprint;
- the use of internationally accepted metrics for measuring the main environmental impacts of packaging (e.g. grams of CO₂ equivalent per unit);
- cooperation with relevant stakeholders.

Environmental information to consumers

ACE supports clear rules and standards for providing environmental information to consumers but considers the focus on eco-labels found in the SCP to be too narrow an approach. Communication needs to be meaningful and simple. Relying exclusively on a label can result in oversimplification and therefore be misleading. In addition, too many labels on a package risk confusing the consumer rather than helping him make informed choices. Environmental labels on food packaging already typically compete for the consumer's attention with information on other aspects of the package or its contents (ingredients, nutritional claims etc.) and may give rise to further confusion if communicated according to divergent national standards and/or initiatives.

Insufficient recognition is given to a range of other available channels for informing consumers about product environmental performance, e.g. web-sites, print media, in-store communication etc. Other types of communication – e.g. environmental product declarations – should also be considered.

Clear EU rules on green claims should also be developed. Such claims should refer to publicly available, verifiable, and third-party verified data. They should be in compliance with the principles and legislation on fair commercial practices. EU legislation on unfair commercial practices (Directive 2005/29/EC) could usefully be extended to ensure this.

Communicating the carbon footprint

As the leading environmental indicator for packaging, the carbon footprint needs to be communicated prominently and effectively. How this is best



managed is up to the stakeholders principally involved, namely food producers and retailers. To guarantee credibility, the data and calculation methods that are the basis for communicating the CO₂ impact, whether business-to-business or to-consumer, should be third-party-verified and in accordance with international standards.

The Retail Forum

ACE also notes the Commission's intention to create a Retail Forum. The beverage carton industry has many years of experience in the above mentioned areas (e.g. measuring the environmental impact of packaging, greening the supply chain, communicating on these to customers), and would be happy to provide relevant expertise and technical data to support the Forum's activities.

In conclusion, ACE looks forward to participating actively in discussions and actions on these and other issues which underpin effective implementation of the Action Plan.
