Paris, January 31st, 2025

Ref: **observations on report by CLEAR and University of Hertforshire – review of UK food ecolabels**

Dear Sir, Dear Madam,

Please find our observations on the report untitled **"A methodological review of UK food ecolabels".**

As you will see from this contribution, our scientific Fund is the owner of Planet-score brand.

We are open to further discussing the content of this document.

Yours sincerely.

Pierre-Henri Gouyon
President

General overview

The Solid Grounds Institute is a **scientific Fund**. Its mission is to conduct and finance research work with a view to accelerating the transition to agroecology and to sustainable food systems and diets.

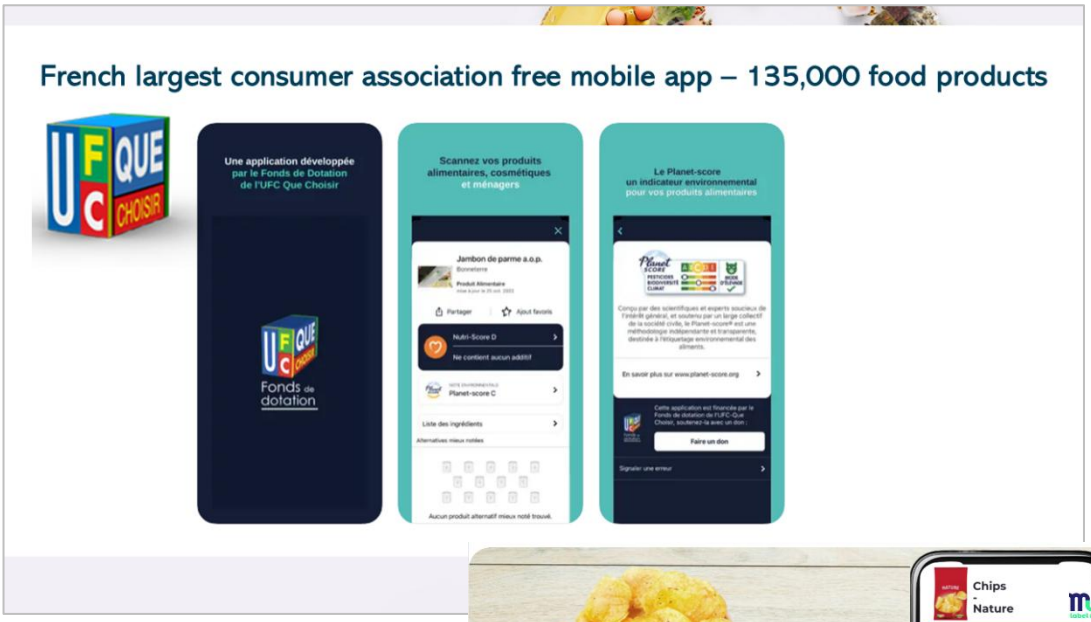
It is recognized by the French State as a **general interest organization**.

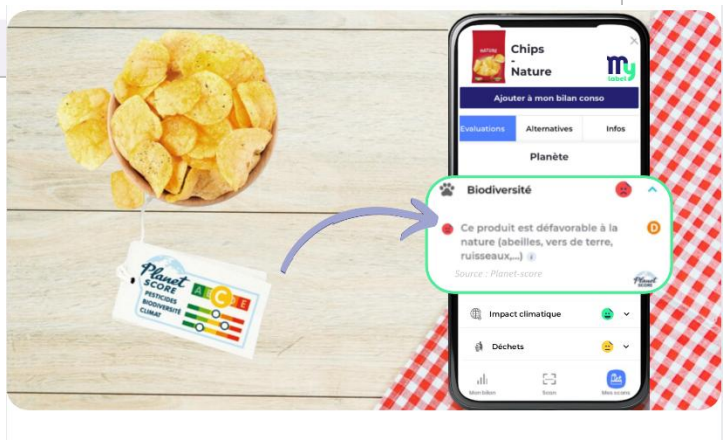
Its governance is composed of **multi-disciplinary scientists (80%) and NGOs (20%)**.

In addition to the scientific work it carries out, the Fund has also been entrusted with the Planet-score brand, which it owns (see press releases in 2023, available on Planet-score website). It acts as a warrant of Planet-score's independence, integrity, and scientific robustness.

This governance for Planet-score is a major societal innovation: this scheme for environmental transparency and eco-design is in the hands of civil society (experts and associations).

Planet-score currently works with more than 300 brands, in 12 countries. 150 million of labeled packagings are on-shelf in 30 countries. 135,000 food products are labeled and displayed in the free mobile application of the French largest consumer association (member of BEUC), UFC Que Choisir, as well as other mobile apps :





1. General feedback on the process

1.1 Context

We have received this report for review on December 11, 2024. No prior mention had been made to us about this work, no contribution had been asked for, no question had been sent to us, and more generally, we have not been contacted. On Dec. 11th, we were proposed by mail to provide comments and feedback if we would like to.

> *"[This piece report was carried out]* ***using the information publicly available*** *by each of the ecolabels investigated. We would like to receive any comments you have on the report, and if supplied before 31st January 2025, these may be included in material at the event [in March]."*

Sabine Bonnot, president of Planet-score, replied as early as December 12:

> *"Thank you for reaching out, and for sending this pre-report for our proof-reading on Planet-score.*
> *Reading rapidly across the document, we have already found* ***many elements which should be updated or corrected regarding our label****.*
> *It would be much more practical for us to work on a Word version, in Modification mode so that you can see what has been changed or corrected."*

The answer she received was the following:

> *"Thank you for your swift reply and interest in our report.*
> *In response to your questions, we would like you to know that the Ecolabel Review project we conducted has been completed (****timeline Oct 2023-June 2024 and based on publicly available information*** *i.e. scheme websites) and this is a final draft of the report.* ***It is not a pre-report for proof reading or amendments****. We do, however, welcome feedback that you have, and this will be taken on board for any follow-on work."*

1.2 Our view on the process

Before we dive deeper into the content, we have to say we find it awkward that no update can be included in this report which we had no chance to read, at least on the parts concerning directly Planet-score. Indeed, it appears that there are massive misunderstandings of our methodology, scope, data used, objectives, governance, endorsers, scale-up status and real-life results in terms of agroecological transition. It appears that this report is not up-to-date in comparison to what is publicly available, even if considering only until June 2024.

There are 10 schemes considered in the report, it seems that it would have been highly feasible to reach out to each of them at least once for an interview in the course of the 9-month project. Or for a written feedback on the part describing each of them. This would have prevented what we currently observe: what is written about Planet-score is not correct in many respects, and it seems that what is written about other schemes (Eco-score for instance) is not correct either.

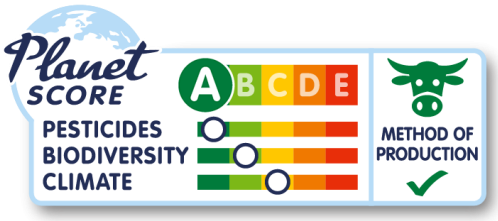
Contacting us to read the report before declaring it "final" would have been far more efficient and respectful. It is plausible that you would have also learnt more from other non-UK based schemes, should you have interviewed them. The clarity and relevance of the output and the conclusions drawn in the report depend mostly on the quality of your understanding of critical points for each scheme. As it stands, we think it is misleading, at least on Planet-score.

Environmental assessments and eco-labeling for consumer transparency are complex topics. Planet-score is well known today for having a prominent voice across Europe on this matter. We are looking forward to a more collaborative way forward, and wish your team will later engage professionally if they wish to give a truthful, fair and robust representation of facts, stakes and status.

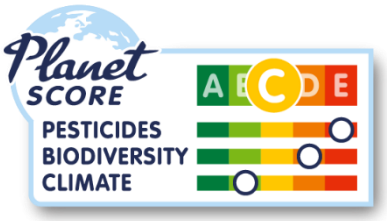
2. Feedback on the description of Planet-score

1.1 Practicalities

Before entering conceptual observations, we first need to r**equest that the Planet-score label displayed on page 41 be changed** (as well as on any other instance where it could be displayed). This label is not the one which has been marketed since **May 2023**. The correct label is also provided separately, and here is how it looks (when the food product contains an animal ingredient, here it could be a processed food product containing some agroecological dairy product or cattle meat):



When there is no such animal ingredient, the label could look like this (here it could be an applesauce from non-agroecological sourcing for apples and for beet sugar):



1.2 Information about Planet-score (pages 41-44)

Planet-score has been developed by a large consortium of scientists, experts, consumer associations (including UFC Que Choisir, the cousin organization of UK *Which*), and environmental NGOs. This was an informal consortium at first, which was organized and structured legally two years ago (beginning of 2023).

Planet-score brand is owned by our foundation (since end of 2023). The Board of the foundation is composed of scientists (80%) and associations (20%). The Foundation warrants that integrity, transparency and the required level of expertise are implemented. Most importantly, it verifies that the scientific compass (see below) is respected, and updated whenever new meaningful knowledge is available.

Planet-score is scaled up on the market by a purpose-driven company. This is the organization working on a daily basis with food companies, from farmers cooperatives, to producers, retailers, as well as restaurants and food catering services (both public and private).

Such an independent governance is unique to our knowledge.

As for scale up on the market, Planet-score is currently working with more than **300 brands**, with companies' headquarters **in 12 European countries and one in Africa. This includes UK brands**. Planet-score **on-pack labeling is currently present in 30 countries** (i.e. broader than the European market). **This status is as of 2023.**

The initial consortium has worked along two approaches (and the Fund goes along the same way):

- **top-down**, by assessing the relevance of various possible computation schemes, and by calibrating algorithms which were able to reflect truthfully the environmental quality if very diverse situations. LCA and especially the PEF were extensively analyzed, and perceived as not relevant for food products.
- **bottom-up**, by working with **farmers' organizations** (big and small) to check for real-life relevance.

Planet-score aim is to differentiate between products **across different categories** of food products, as well as between products **within the same category**. As the vast majority of the global environmental quality of a food products on-shelf is related to the on-farm practices, **Planet-score has a strong focus on reflecting fairly the nuances of farming methods and farming landscape alterations**. Planet-score assessments take into account the finished food product, **from farm to fork** (including processing, packaging, transport…), even though this downstream part is usually minor in the global assessment.

Moreover, and this is unique amongst labeling schemes (to our knowledge), Planet-score is **explicit about its compass, i.e. about the vision of what a global sustainable food system is, and the systemic point which the orientation tools should target**. This should be the basis for any scheme, and it is a complex step. But a much more useful one than trying to count all "impacts" of all kinds, as we will see later. This vision embraces all aspects of the food system, **from farming systems to rural landscape management (land sparing / land sharing) to the evolution of diets**.

Planet-score vision is based on the **scientific prospective works by CNRS[1] and IDDRI[2]**, which we deem are **systemically relevant** (they have being used by the European Commission as cornerstone for the design of such public policies as the Green Deal and the Farm to Fork Strategy). One of the authors of those scientific works is a member of our Board, and has written ***"Ten Years for Agroecology** : An agroecological Europe in 2050: multifunctional agriculture for healthy eating"*.

Transition is about vision, from point A (today's consensually unsatisfactory point) to point B. All schemes should be able to explain what is the scenario they are aiming at, what is the point B they are targeting. Our vision is explicit: **agroecological transition for farming systems, and "less but better" animal products** (approx. 50% less). But we are very clear that "vegetal-forward" or "vege-based" transition will be of no help on its own. "Vege-based" alone is very far from any systemic transition, and even farther from agroecology or even people's health.

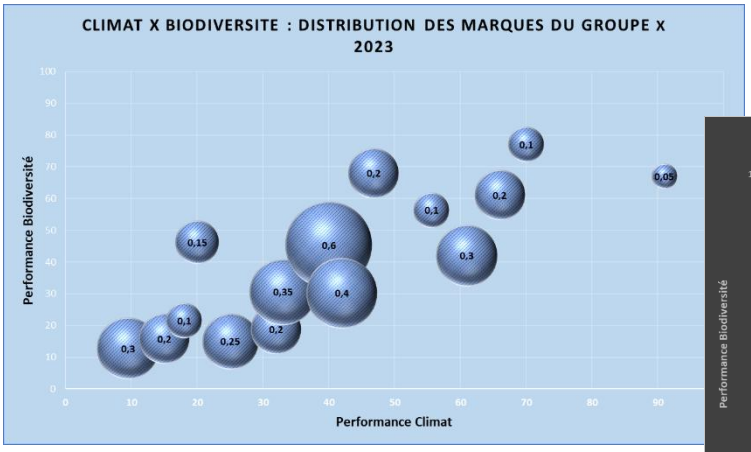
[1] Billen et al, 2021 : Reshaping the European agro-food system and closing its nitrogen cycle: The potential of combining dietary change, agroecology, and circularity
[2] Poux et Aubert, 2018 : An agroecological Europe in 2050: multifunctional agriculture for healthy eating

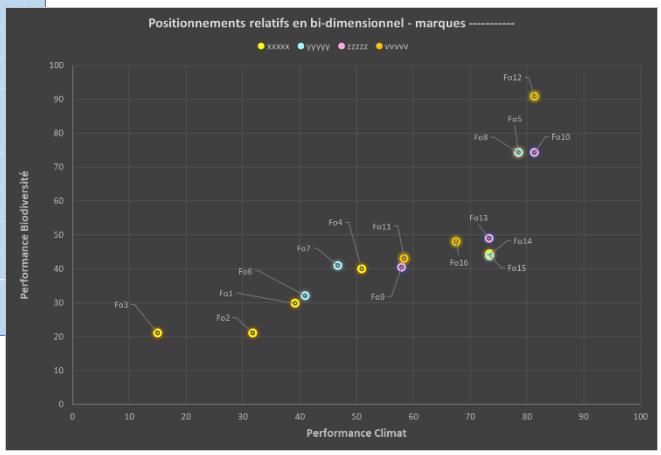
As far as data are concerned:

- Some LCA inventories (based on primary data) are used, but these data represent a **very minor part of the global Planet-score assessments.**

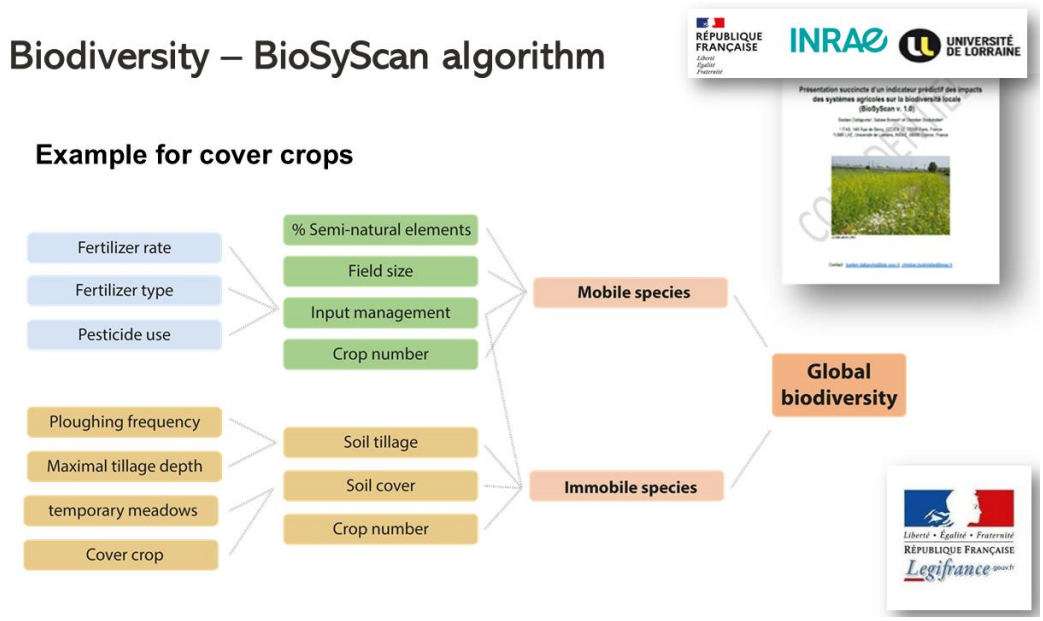
- More importantly, data relating to **farming practices** are used for the major part of the assessment. As soon as some (or sometimes a lot of) **farm data** are available, this is what we use to process the assessments.

- Please note that **"primary" data can also be quite simply the result of compulsory of forbidden farming (and/or processing, packaging…) practices**. Hence it is very useful for Planet-score to rely on certified schemes to be able to compute "by default" (conservative, i.e. without greenwashing) assessments, based on **"by default" threshold practices, which are controlled, and valuable as primary data**. For instance, "certified organic" on an ingredient or food products means that when it goes through Planet-csore algorithm, there will be fertilization by default, but none synthetic (same for pesticides, or for the absence of GMOs). But with the EU organic label there will be no specificity about farming landscape (percentages of hedges…), or cover crops, or origins for the feed etc, for instance. This can be refined **when Planet-score has access to farm data, which is very frequent, contrary to what is written in the report**. This is vastly incorrect, and should be updated, as many (big and small) companies have been publicly reporting for three years about the work Planet-score is doing on the basis of detailed data, either in conferences, webinars, or in their CSR, EFR and now CSRD reports.





The Planet-score algorithm relies on **25 indicators**, 12 from LCA inventories (but again, they represent the smaller part of the results), and 13 which are systemic. The widest meta-indicator of Planet-score (assembling is **Biodiversity**, accounting on average for more than 60% of global scores. Biodiversity assessments are based on a specific calculation tool called **BioSyscan**, designed with researchers specialized on "biodiversity and farming practices". Based on the more up-to-date scientific articles, published on the basis of on-farm monitoring in various EU pedoclimatic settings, this simple tool makes it easy to assess **the quality of farming practices and landscape management, without having to gather and monitor specific outputs** (see below). This tool, as well as Planet-score as a whole, have been approved by the French State in April 2024 as relevant basis for **driving and financing on-farm agroecological transition.**



The result of Planet-score assessments is twofold, and it leaves no stone unturned in terms of environmental relevant items:

- It is primarily a **system-scale assessment**.
- Inside the farming system assessment (which gives the basis for the score of all products from the farm), Planet-score renders some nuance between more or less intensive food products (i.e. **product-scale assessment**).
    - For instance, within a conventional crop rotation, sugar beet production (which has a "by default" rather intensive technical route in terms of synthetic fertilizers and pesticides, soil tillage…) will end up with a lesser score than sunflower (lighter technical route). This is based on primary data as compiled in French and/or European farming statistics (the "by default" value being the worst observed, corrected with real on-farm data as soon as they are shared with Planet-score).
    - Another instance: being organic certified will not entail any specific positive data "by default" on cover crops, size of farming plots, %ages of hedges etc. As soon as we have more specific on-farm data, the assessments are refined, and organic products do end up with variable results, even though the corresponding underlying systems start from a better system-scale assessment. Those farming systems are, unsurprisingly, usually better positioned on average, but there often is room for improvements on some items.

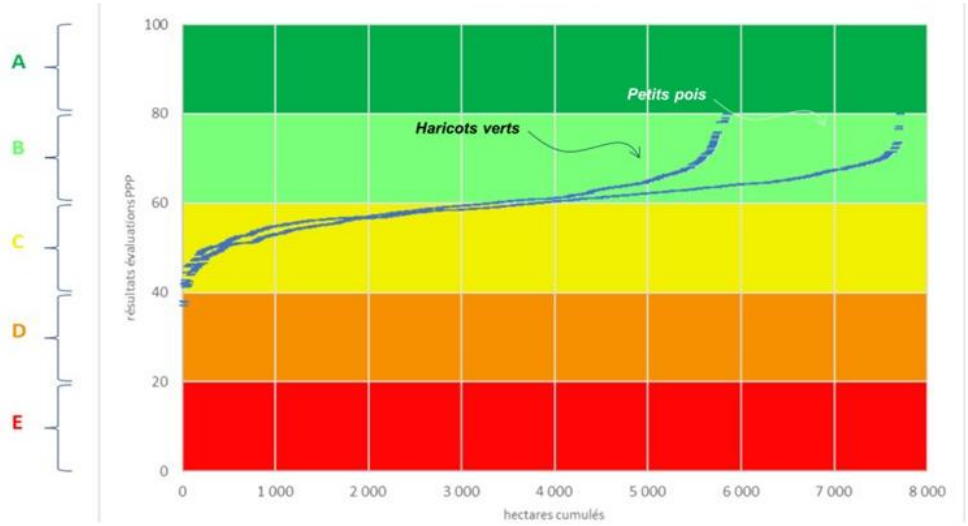
Most of the work of Planet-score assessment team is about calculating on the basis of primary on-farm data and/or by default primary data as minimal requirements in controlled specifications and standards. The work accomplished on very precise farm-data basis in the last four years is, to our knowledge, the widest in Europe, and possibly worldwide.

Hence Planet-score is typically a hybrid scheme, as the report seems to call for in the conclusion.

Planet-score works with big and small farmers organisations, such as invivo (annual crops), Fermiers de Loué (eggs and chickens), Eureden d'aucy (vegetables), LVMH (Champagne), Lactalis (dairy), Lobodis (coffee, worldwide), Jardins du Midi (garlic and onions) and many others for citrus, chocolate, meat, olive oils, with extensive specific farm data. More than 30.000 farms have been assessed to date (& re-assessed on a yearly basis). Two example are shown below, as shared by d'aucy and Jardins du Midi during one of our 2024 webinars (assessments : 2500 farmers for d'aucy, 200 farmers for JdM, from France, Spain, Argentina, Chili, Peru, and New Zealand).

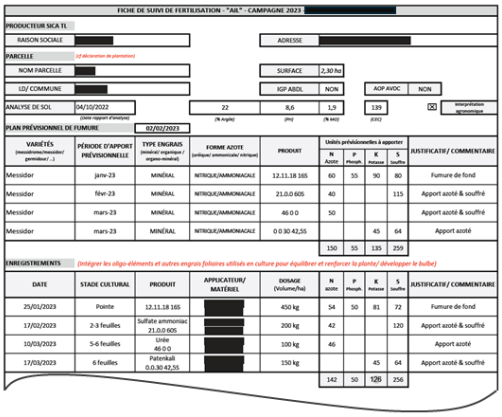
Selected slides from this webinar (250 participants) :

D'aucy:

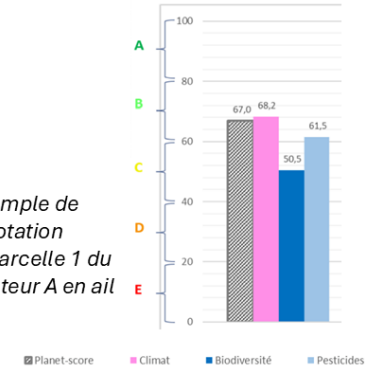


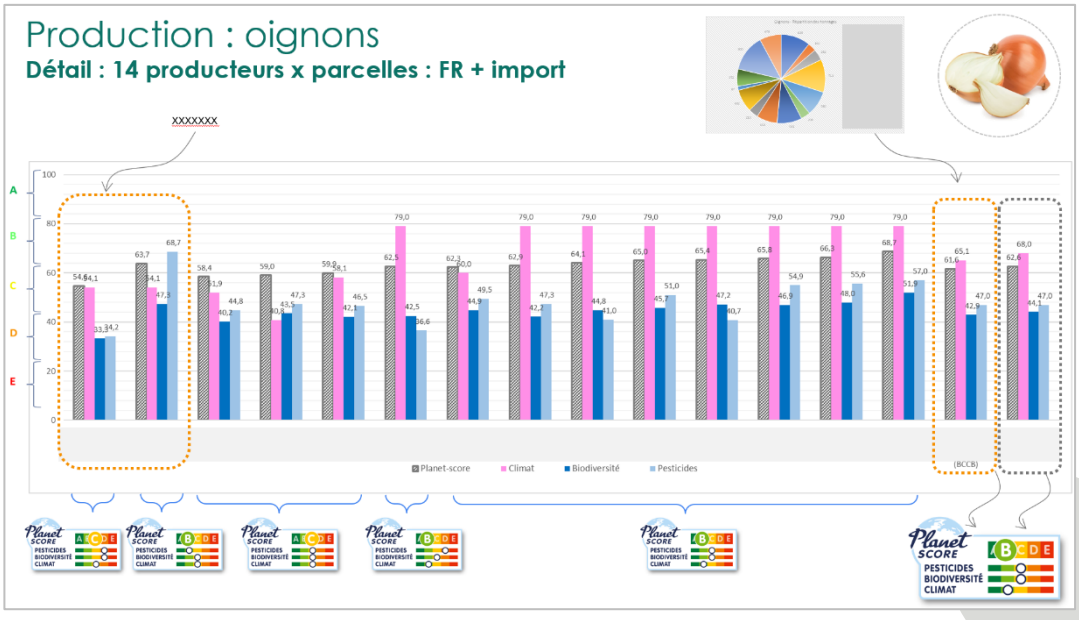
Jardins du Midi:

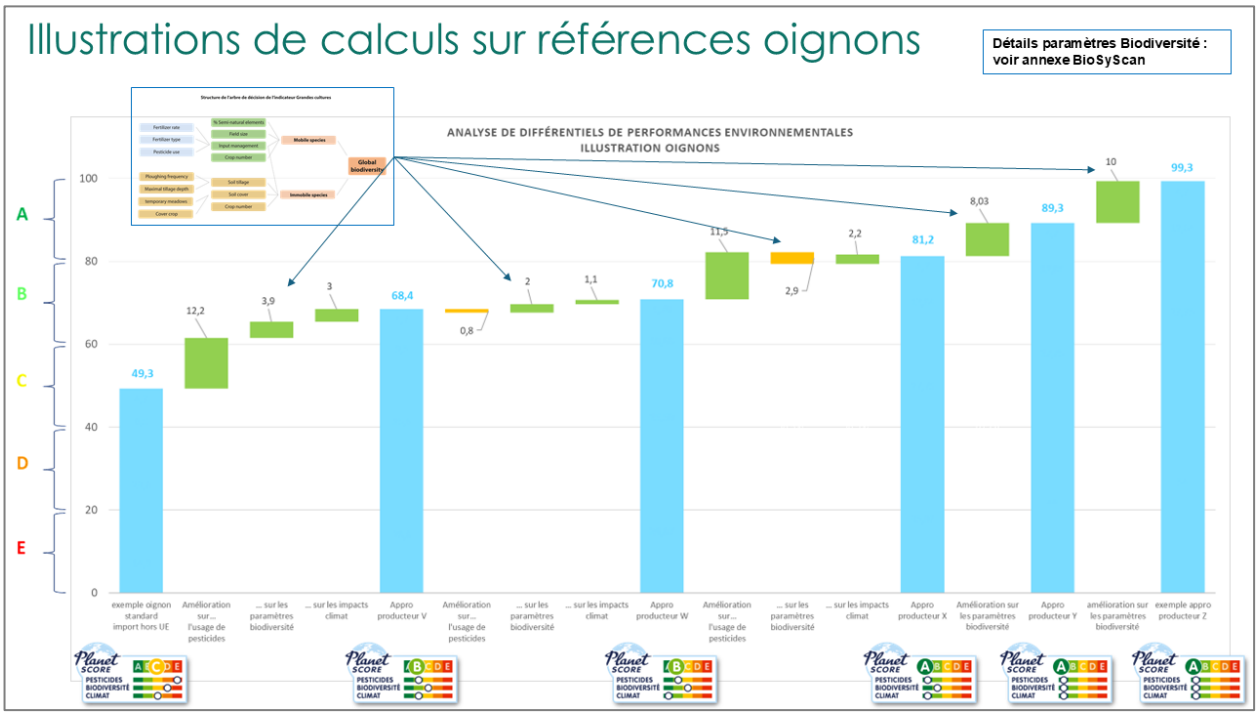
Exemple fiche culturale de la parcelle 1 du producteur A en ail



Exemple de notation de la parcelle 1 du producteur A en ail






Illustrations de calculs sur références oignons
Détails paramètres Biodiversité : voir annexe BioSyScan
ANALYSE DE DIFFÉRENTIELS DE PERFORMANCES ENVIRONNEMENTALES
ILLUSTRATION OIGNONS
A
B
C
D
E
100
80
60
40
20
0
49,3
12,2
3,9
3
68,4
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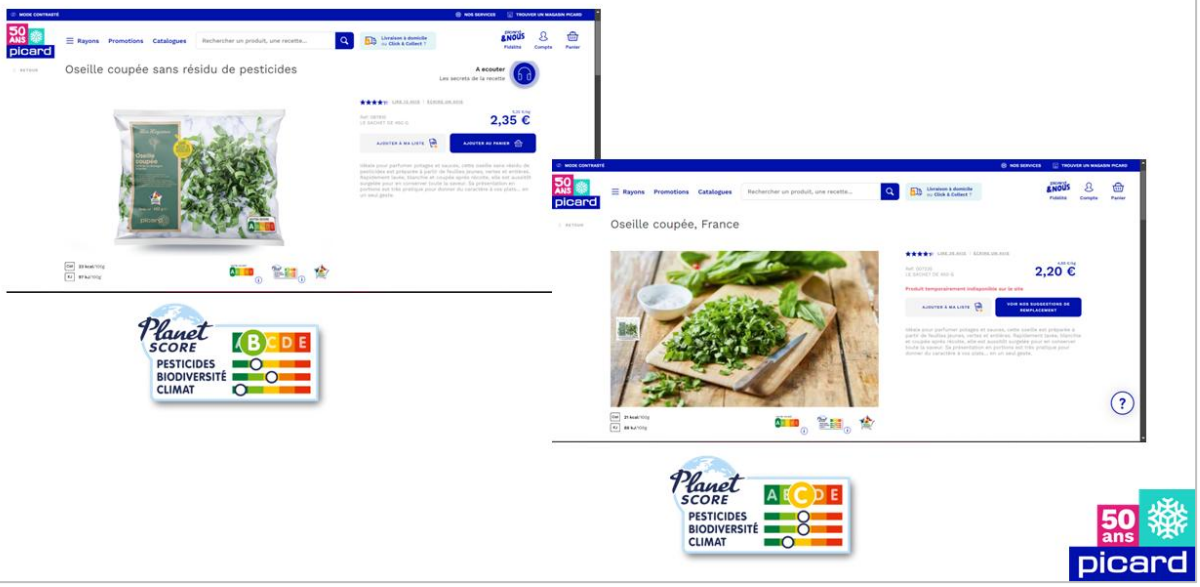
2
1,1
70,8
11,5
2,9
2,2
81,2
8,03
89,3
10
99,3
exemple oignon standard import hors UE
Amélioration sur ... l'usage de pesticides
... sur les paramètres biodiversité
... sur les impacts climat
Appro producteur V
Amélioration sur ... l'usage de pesticides
... sur les paramètres biodiversité
... sur les impacts climat
Appro producteur W
Amélioration sur ... l'usage de pesticides
... sur les paramètres biodiversité
... sur les impacts climat
Appro producteur X
Amélioration sur les paramètres biodiversité
Appro producteur Y
amélioration sur les paramètres biodiversité
exemple appro producteur Z
Planet SCORE
PESTICIDES
BIODIVERSITÉ
CLIMAT

Picard:


Valorisation des trajectoires de progrès des producteurs partenaires
✓ Mis en lumière à l'occasion des 50 ans Picard des voies à adopter rapidement…
50 ans picard ardo
½ journée À LA FERME
APIleg
Planet SCORE
PESTICIDES
BIODIVERSITÉ
CLIMAT
✓ … pour permettre au système agricole français d'être toujours debout dans 50 ans
50 ans
picard

Illustration sur cette filière ApiLeg – site internet



Des entreprises qui communiquent de manière responsable

As is clear from those examples, **Planet-score is not a positive green claim**. It is a **powerful anti-greenwashing, consumer transparency and eco-design device**. Companies which are communicating are all going for full transparency (more than 120 already are labeling on-pack, amongst the 300 which are in the process of getting the assessments done). Specifically, some of them have a majority of their food products in the orange and red colors, with red animal welfare tags. Picard has done so on its 2000 food products. With a wide success, consumer-wise, and in the business community (only food company awarded at this annual CSR event). **Planet-score is about sincerity, not marketing**.

Today, Picard publicly speaks about their reflections on how to better pay farmers for their agroecological efforts for these food products with improved Planet-score labels. This issue of **fair pay for farmers** is a subject Planet-score has also been driving actively since **2022**, as is visible on the website and Linkedin page. Farmers' organizations are talking loudly about Planet-score, see this TV ad for example.

Planet-score is as much "farmer-focused" as "consumer-focused", contrary to what is written in the report.

Conclusion of this section:

Much of the information on pages 41 to 44 is incorrect with respect to what is written above (initiation, governance, methodology and thematic completeness, use of primary data, work with farming organizations, countries in which it operates…). This information was available when the report was being written.

We hope the report will be corrected. Otherwise, it would represent a biased and disparaging view of Planet-score. No relevant follow on could be based on such a foundation.

Planet-score is as much "farmer-focused" as "consumer-focused".
Planet-score is as much "bottom-up" as "top down".
Planet-score governance is composed of scientists and NGOs, and strictly independent from any businesses.
Planet-score relies on as much primary farm data as is available.
Planet-score is not about calculating "impacts", but about the environmental quality of food products and systems.
Planet-score has a complete environmental scope, specifically so on Biodiversity issues.
Planet-score is typically a hybrid scheme (system-scale and product-scale), as the report seems to call for in the conclusion.

3. Feedback on the description of other schemes

We may give more precise feedback with more time, but at least, the following observations can be made.

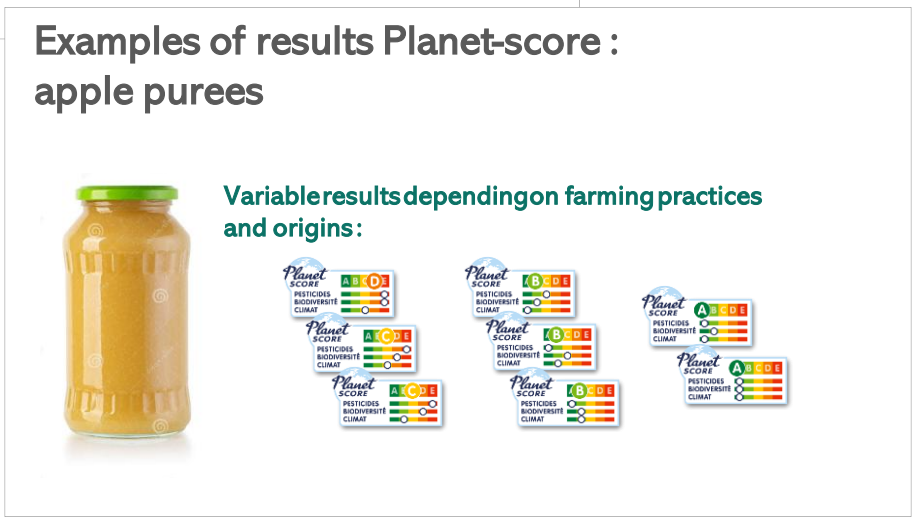
3.1 Eco-score (pages 29-32)

The Eco-score label which is displayed in the report (page 29) is not owned (nor endorsed) by ADEME. It is owned by private companies (digital sector and LCA consultancy). ADEME did own the verbal brand "eco-score", but does not use it, and will not use it for food products for legal reasons (see below).

Eco-score brand cannot be used anymore (neither the figurative label, nor the verbal brand), because the term "Eco" is not allowed to be used on food products in the European market unless they are certified organic (European Commission Regulation). After a two-year legal procedure, launched by a European NGO, the owners of the two brands have accepted in May 2024 to stop using the brands. The press release by the stakeholders is accessible here (third section of this newsletter).

Eco-score brand has been replaced in January 2024 by the brand "**Green-score**". The ranking is now from A+ to F.

The calculation methodology is unchanged. It is composed of 80% PEF + 20% bonuses. It is unclear to us whether it would favor agroecological farming practices. See illustrations below, calculated on January 18th, 2025, on the corresponding Green-score website. These results should of course be expanded to include more cases and check for relevance on broader categories.



Examples of results Greenscore : chicken

Free range, locafeed, no GMO, nodeforestation

D

Standard, intensive, import from non-UE

D

Examples of results Planet-score : chicken

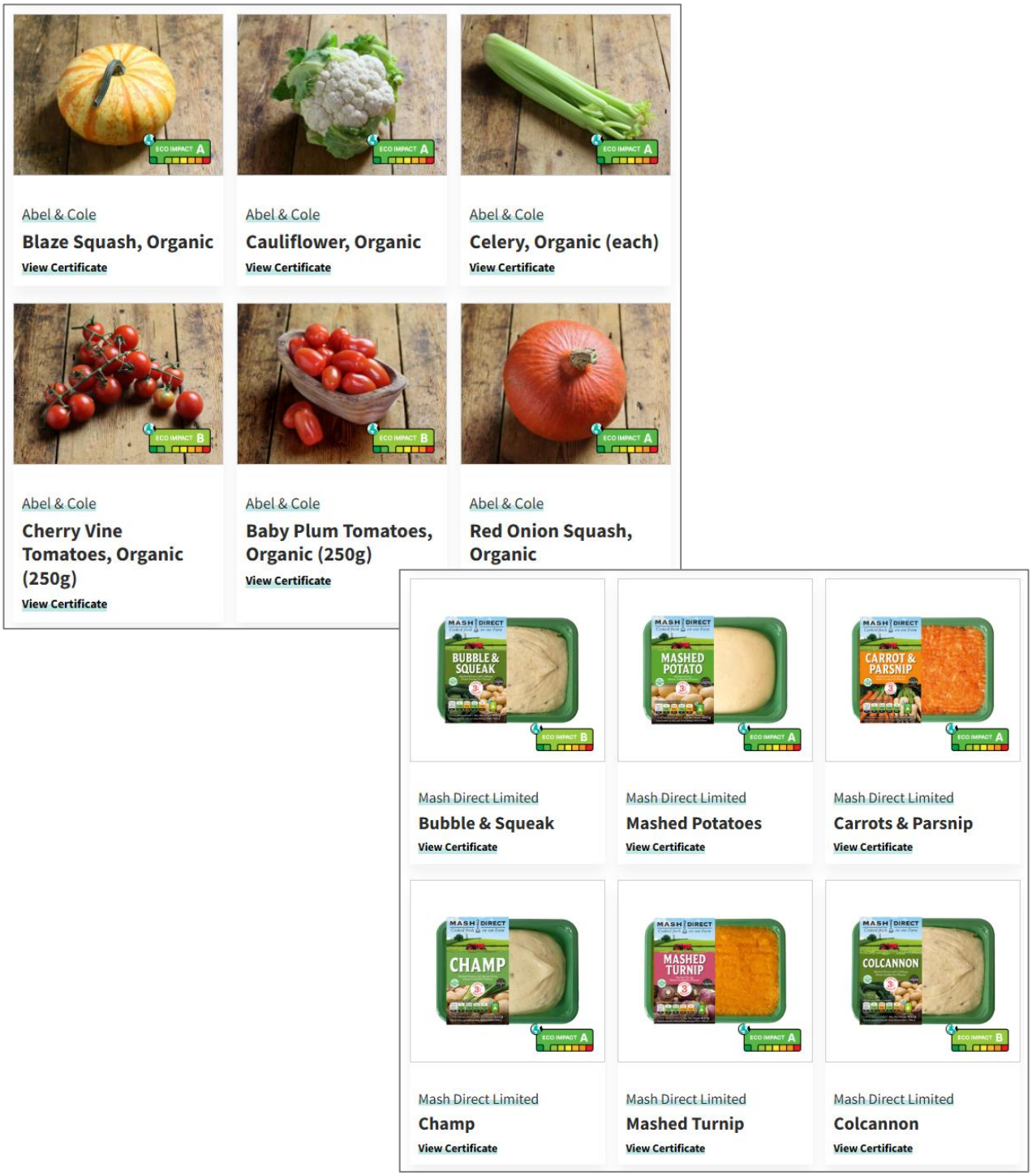
Free range, locafeed, no GMO, nodeforestation

Standard, intensive, import from non-UE

3.2 Foundation Earth (pages 35-38)

It seems that there is some uncertainty on the possibility to use such an “eco” brand on the European market (see above, Eco-score).

As the methodology is 100% PEF, there seems to be potentially confusing results with regard to farming practices, for instance:



These are the kind of real-life illustrations which we think the report should have investigated. Examples from IGD and Foodsteps could have been enlightening.

It would have been interesting to be more precise about the governance of the FE scheme, and the vision behind it. As far as we know from what is publicly available, this scheme (as well as Eco-score/Green-score, and probably any PEF-based assessment scheme) are all orienting towards vegetal-based diets, much more so than towards agroecology. We think that this is far from enough, and that it is not the right entry point into the "food sustainability" subject. **Agroecology comes first**. Respect of carrying capacity of ecosystems comes with it, so do biodiversity and climate.

As a whole, it seems that the more the schemes rely on PEF, the more they are favoring intensive farming systems. This should have been part of the investigations of the report, as this is an essential point. This was thoroughly analyzed by researchers in the last three years. You may want to read this report by INRAe and CNRS scientists on eco-lebaling in France (Dec. 2023), this publication by IDDRI (Nov. 2022), and this article by an LCA expert (Frida Royne), untitled The LCA Paradox.

Conclusion of this section:

The report should be corrected and/or completed on some points concerning other eco-labels.
The report should also investigate the potential of "eco"-labelling schemes to cause unintended environmental outcomes and to allow greenwashing and misleading claims.

4. Conceptual framework

Many more things could be said on this topic, if our teams had been given more time to contribute, and if we had been asked to engage in an expert dialogue in the course of the project.

As a summary, these are our main observations on the conceptual framework.

4.1 Complexity vs. relevance

The report has heavily focused on a complex conceptual framework which tells very little about the relevance and scalability of the schemes in real-life and for agroecological transition.

The impact categories chosen are cumbersome and some of them are not fit for the purpose of comparisons (*UV-B regulation…*), while important others seem to be lacking.

Data quality scores are one more layer of complexity, which is fine for research purposes, but not relevant for communication purposes.

A realistic balance should be sought in future works.

4.2 Typology

There seems to be a misunderstanding about the **fundamental differences between environmental labeling and positive green labels.** They are not in competition when it comes to informing consumers, and it feels that this perceived threat has at least partly informed this work.

As explained above, **environmental labels are not marketing devices (at least Planet-score is not), but transparency devices to fairly inform consumers, by giving them a clear and comprehensible summary about the environmental quality of food products, be it positive or negative**. It is also a device for companies to **eco-design** their products, **mainly on farming practices** as this is a major part of ecological issues for food products.

Eco-designing needs primary data and/or controlled schemes and specifications for farming products. This is where positive green labels are very useful, as they do not only serve as positive green claims towards consumers: they can also serve as valuable inputs into assessments algorithms and labelings such as Planet-score.

4.3 Illusion of precision, illusion of actual measurements

There is a strong focus on "*measurement and control of outcomes*". We think that envisioning to have outcomes measured is unrealistic. When the report calls for "directly measuring GHG emissions" (from a soil, a cow, a tractor, manure…), we feel like the team has gotten lost in a trap. "Controlling outcomes" is an engineer dream, maybe also a consultancy or certification body dream, but this is not a realistic option in the real world, and this is not necessary to drive agroecological transition. **Trying to monitor and measure "outcomes" would be very costly, highly subject to sampling biases and uncertainties, and mostly not acceptable for farmers (verification burden on many outcome items)**. We are concerned when we read : *"Technologies […] are rapidly evolving, for example in direct measurement of emissions and remote sensing"* (page 9).

When it comes to living systems (this is precisely what farming systems are), **pragmatic approaches** must be favored. The farming methods which are beneficial to the environment are well known. Predictive assessment methods (such as BioSyScan in Planet-score) are sufficient and relevant to reflect whether things are being done or moving in the right direction (modelling). They can be used with simple primary farm data (see above).

Consumers need to be informed in a quali-quantitative manner, and nobody expects any scheme or label to measure, monitor and quantify real emissions and impacts. And have them "verified" in the fields.

Aiming at having clean farm data is one (relevant) thing, aiming at having measured and "verified outcomes" or "actual impacts" is not.

We would like to be reassured that this drive for "accuracy" on "actual impacts" is not aligned with a desire to pursue trading opportunities (carbon credits, biodiversity credits…).

4.4 Missing relevant questions

The report *"does not aim to explore the effectiveness of ecolabels as tools for changing consumer of business purchasing behaviour"* (page 7). This is regrettable, as we think this is the most important point to check in terms of *"implications for a transition to agroecology, food sovereignty, and meeting national environmental targets"*.

The report does not look either into current scientific controversies around environmental metrics (GWP* vs. GWP100 for GHG emissions, water footprint, land use, functional unit…). These could be interesting topics to look at in future works.

4.5 Scope

We felt uncomfortable with the fact that the report enhances repeatedly the concept of "*food sovereignty*". Whereas this is an interesting and relevant topic, we do not think it should be mixed up with "*transition to agroecology, and meeting national environmental targets*".

The concept of "*food sovereignty*" has 35 occurrences in the 80-pages report.

This is a subject which can be dealt with by indicating the origin(s) or farming ingredients. This is not the purpose of environmental labeling.

4.6 Plurality

We do agree that the "*push to develop a harmonized approach to eco-labeling is largely from product-based (top-down) perspectives and motivations*" (page 85). We are aligned with the report statement on the risk of such a harmonization, which is mainly called for by non-agroecological businesses. For obvious reasons as the harmonization basis which is put forward is the PEF.

In France, the **State Competition Authority** recently published a report on **sustainability scoring schemes** (January 2025). After one year of investigations, during which Planet-score (and consumer association UFC Que Choisir) were given hearings, this report indicates that **plurality has a strong added value**, as independent schemes do help consumers identify (un)sustainable products, and help businesses improve on sustainability dimensions.

See appendix for further details.

4.7 Taking care

Positive change cannot happen only on the sole basis of positive labels. At least, this is a clear lesson learnt from reality on the food market in the last decades.

While we strongly support endeavors such as the one pursued by CLEAR with this report, we think it may do more harm than good by choosing a comparison protocol which introduces quite a lot of confusion.

Supporting the transition to a fair and ecologically friendly transition means being able to cooperate with all positive energies, engage professionally with them, work transparently and avoid domination behaviors, build trust, and take stakeholders' inputs into account.

We hope those are open options for the future.

Conclusion of this section:

The report should be corrected and/or completed on the various points listed in this contribution.
The report should investigate the potential of "eco"-labelling schemes to cause unintended environmental outcomes and to allow greenwashing and misleading claims.
It should also investigate which environmental labeling schemes effectively work in real-life today, on the basis of real products and real assessments results and labels.

For future work, if the agroecological transition in farming practices is what is aimed for, we feel there is room for making the research approach much simpler. We may contribute to this simplification, as Planet-score is already a scaled-up hybrid scheme, improves the connections between farmers and consumers, and efficiently drives businesses along the agroecology shift.

Appendix : Overview on neutrality

Environmental "accounting" methods are not and cannot be neutral objects. Evaluative systems meant for communication purposes do have to aggregate issues that are heterogeneous in nature, severity and units. The choice of weightings between issues will remain a subject of scientific debate and a fertile ground for innovation in the field of quantification. For example, when it comes to environmental issues, scores are supposed to agglomerate issues such as green algae on the coastline, mortality of bees, birds, earthworms (...), km of hedges pulled up or replanted, extra-degrees of atmospheric temperature rise, deforestation of equatorial forests... It is not possible to reach a consensus on how to "count what counts" in an aggregated way in the environmental field. In fact, this is what the European Commission's Research Centre (JRC) refers to on the first page of its report published in 2018 on the PEF (Product Environmental Footprint):

> *"Any weighting scheme **is not mainly natural science based** but inherently involves **value choices** that will depend on **policy, cultural and other preferences and value systems**. **No "consensus" on weighting seems to be achievable**. This situation does not apply only to weighting in a LCA or Environmental Footprint context, but seems **inevitable for many multicriteria approaches**."*

PEF is one of the least relevant tools to assess the environmental quality of food products (see references above). We feel this is an important issue, as some schemes do use this accounting system to "rank" food products and communicate "green" claims which cannot help the food system become more sustainable. As **NGOs** have declared in an open letter to the European Commission in 2022, as well as the **BEUC** in this position paper, the PEF for example can be a very powerful greenwashing tool, and a way to mislead consumers.

What matters is not precision, or norms. It is fairness of the information delivered to consumers and businesses in terms of environmental issues, their relative importance, and the absence of blind spots in the assessment methodology. Environmental labeling schemes such as Planet-score are based on as much primary data and/or certifications as possible (but not on measured outcomes). This is scalable, and relevant for stakeholders, from farmers to consumers.

No one can claim to have superiority on how things should or should not be accounted for. The ultimate touchstone is to look at the assessments' results of foods products across various categories and farming systems, and make sure that there are hard scientific and real-life facts backing the positive or negative labels.

This should be the next step for this work. As the only thing we need to be collectively sure of is whether sustainability schemes genuinely and efficiently help us achieve our agroecological transition objectives.