

UK Food Ecolabel Methodological Review Steering Committee  
3rd March 2025

Planet-score UK Representative and Advocacy Group

Dear Roger and colleagues,

Many thanks for taking the time and effort to contact us with your comments on the 'Methodological review of UK food ecolabels'.

The Committee has had the opportunity to read your responses to the draft report and hear from the researchers who carried out the report.

What is clear from your detailed response and the adjoining document from the Solid Grounds Institute is that Planet-score has a strong scientific basis and is designed to support agricultural transition to higher standards. However, the researchers used available online information only and were unable to access the information of the sort which you provided. The researchers and others in the Committee who work on Ecolabels revealed that accessing information on Planet-score was difficult (and that was not solely due to many documents being in French).

It is understandable that Planet-score want their Ecolabelling system to come out of the report as an excellent example of how it should be done. However, labelling is for the public's benefit, and the Committee feels strongly that accessible public information which can enable consumers to judge the efficacy of schemes for themselves is essential. Having a robust methodological approach does not, of itself, mean that the labelling system is effective. A key aspect of labelling is being able to clearly demonstrate the approach and get buy-in from consumers and others.

The Committee stands behind the research approach, and we respect the findings as they are the result of independent research. The Committee's role is not to alter or influence the findings but to ensure that the project aligns with the overall research aims and objectives. Scientific research approaches should be rigorous and have integrity. The Committee feel that the research was carried out in this way. All Ecolabels were researched in the same way, with equivalent effort, using online resources only to assess both the methodologies relating to environmental outcome and impact measurement and the transparency of the labelling methodologies. They were also all provided with the opportunity to comment on the draft report. A different research approach, potentially involving detailed contacts with all Ecolabelling groups during the research, would have yielded different results but would have provided limited information on the accessibility and transparency of the Ecolabel methodologies. Allowing one company to submit further evidence for review would mean we would be obliged to afford the same opportunity to all companies. This is not practically possible within this study resource framework.

The Committee agreed that the aim of the work is not to malign particular Ecolabels but rather to help to facilitate the development of Ecolabelling in the UK. Improvement in institutional practices could be shaped by ongoing input from wider stakeholders. The Committee hopes that Planet-score can gain something from this exercise alongside the other Ecolabels reviewed. Schemes will be invited to an event to give their responses to the report and to discuss together what the next steps should be. CLEAR would welcome Planet-score's attendance at the event to help plot the way forward for the Ecolabelling in the UK. As you rightly say in your letter, it is in

no one's interest for the Ecolabelling world to make way for non-ecological approaches through a lack of consensus over their approaches.

The Committee hopes that the report will help provide a basis for constructive discussion of what is needed for individual Ecolabels and for Ecolabelling collectively, as well as for the whole value chain of public accountability and transparency. This is essential if we are to support the much-needed agricultural transition and national environmental goals, as well as achieving food sovereignty.

Yours sincerely

Lisa Norton (on behalf of the Committee, (Ms. Nicholls recused from this letter))  
Chair