

Joint open letter on concerns over PEF methodology for agri-food products

Brussels, 7th of March 2022

Dear Executive Vice-President Timmermans,
Dear Commissioner Kyriakides,
Dear Commissioner Sinkevičius,
Dear Commissioner Wojciechowski,

CC Director Generals: Sandra Gallina, Florika Fink-Hooijer, Wolfgang Burtscher.

We, the undersigned civil society and farmers organisations, are writing to you to ask you to ensure that the future sustainability labelling principles defined at EU level are based on robust methodologies that provide detailed, fair and unbiased information to consumers on the environmental and social impacts of different methods of production, in line with the objectives of the Farm to Fork and Biodiversity strategies.

While we fully support meaningful sustainability labelling of food products, covering environmental, nutritional and social aspects and improved animal welfare, we have serious concerns about the Product Environmental Footprint (PEF) methodology that is currently being considered by DG ENV as a basis for the upcoming substantiating green claims proposal, that will also apply to agrifood products and that could be taken up by DG SANTE to assess the environmental performance of food in the upcoming sustainability labelling initiative within the Framework legislation on Sustainable Food Systems.

The product-focused PEF was initially designed for industrial goods and was not meant to approach complex agri-food systems in a holistic way. While it is still relevant for manufactured industrial products, **the PEF methodology is not adequate to assess the environmental performance of agri-food products.** When applied to food, PEF gives misleading results, since the more extensive the agricultural practice is, the worse it scores. For instance, eggs from hens in cages score better than free range eggs, which in turn score better than organic eggs. When it comes to agri-food products PEF is predominantly an indicator of yields, **favouring the most intensive methods of production while disregarding both a number of positive elements and the negative externalities of the food production process.** Methods of production are crucial to define the sustainability of agri-food products. Indeed, as much as 83% of the impact of the 2500 most consumed food products is linked to agricultural production¹.

Any future sustainability label must aim to support a transition towards more sustainable food systems, rather than further increasing intensification. Life cycle

¹ Ademe Recherche, #32, September 2020. Available [here](#).

analysis methodologies such as the PEF tend to support the continuation of the current intensive system² of food production, the impact of which the Farm to Fork strategy seeks to address. Furthermore, the PEF does not adequately take into account impacts on biodiversity nor the use of pesticides which EU citizens consider increasingly important. For instance, the ongoing PEF category rules (PEFCR) for marine fish does not include fishing methods (and hence fails to consider fish stocks reductions), so any sustainability label exclusively based on the PEFCR would miss fishing's most important impact.

Using the PEF methodology to evaluate the environmental impact of food products has not only been criticised by many civil society actors, but an increasing number of food retailers and brands have also started testing alternative methods allowing for a meaningful differentiation of the diverse environmental impacts of food products.

When designing labelling systems assessing the environmental impact of food products, we strongly urge you to choose methodologies and indicators driving changes in diets and food production methods in line with the targets and ambitions of the Farm to Fork strategy, which seek to reduce pesticide, fertiliser and antibiotic use, while increasing organic farming, improving animal welfare and ensuring decent working conditions.

While we welcome and support the objective of fighting greenwashing in the food sector, it is clear that **the PEF as it currently stands is not suited for measuring the environmental performance of bio-based products** such as food products.

Taking into account that the initiative on substantiating green claims will preempt political discussions that ought to be had in the context of the food sustainability labelling framework, **we ask for an inclusive governance process to be established** to identify a method that properly considers externalities when measuring the environmental impacts of food products. Other recently developed scoring methods, such as the PlanetScore³ or the Omni label⁴ are more closely aligned with the objectives of the Farm to Fork Strategy, including reducing the use of pesticides, fertilisers and antimicrobials, increasing the share of EU farmland under organic farming and improving animal welfare.

We would be delighted to have the opportunity to meet with you and explain in more detail the above-mentioned concerns regarding the PEF methodology as applied to agri-food products, and how we envisage that these shortcomings could be addressed.

² IDDRI, 2021. Environmental food labelling: revealing visions to build a political compromise. Available [here](#).

³ More information on <https://www.planet-score.org/>

⁴ Tim Lang, 2021. The case for a food omni-label: it is time to give consumers what they want. Available [here](#)

Sincerely Yours,

Monique Goyens, Director General, The European Consumer Organisation (BEUC)
Ariel Brunner, Senior Head of Policy, BirdLife Europe and Central Asia
Olga Kikou, Head of Office, Compassion in World Farming EU
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Jeremy Wates, Secretary General, European Environmental Bureau (EEB)
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