

To: Mrs. Sandra Gallina,
Director General
Directorate-General for Health and Food Safety (SANTE)
European Commission

17 March 2023

Dear Mrs. Gallina,

The undersigned organizations would like to reiterate our support to the Product Environmental Footprint (PEF) methodology for the agrifood sector and derived products in view of the expected green claims initiative and future sustainable labelling framework for B2C communication.

We support the development of an EU-harmonised legislative framework proposal based on the PEF methodology to substantiate environmental footprint claims or labelling scheme. This legislative framework should set minimum requirements for the voluntary communication of product environmental footprint information.

We believe that the green claims legislative proposal should foster harmonization across the markets in the EU in order to:

- increase consumers understanding and trust in product environmental footprint information;
- create a level playing field for industry and companies wanting to measure and communicate about their environmental benefits and impacts;
- help drive a real shift towards more sustainable products (in line with the EC [green deal and 2020 CEAP](#));
- facilitate the verification of the scientific substantiation from authorities behind environmental footprint claims across the EU.

When an approved set of Product Environmental Footprint Category Rules (PEFCRs) are available to a sector, we believe the legislative proposal framework should indicate that the methodology rules are the ones that shall be followed. In addition, existing PEFCR's rules should serve as the benchmark to other methodologies and datasets. If a variety of methodologies would be lawfully available to operators to substantiate their environmental footprint claims, this would strongly undermine the European Commission's objective of halting confusing and misleading green claims in sectors that have committed to developing a PEFCR and ultimately can lead to a less sustainable economy.

We understand that the scope of the green claims initiative will not include B2B communication on intermediate products. The transmission of information on environmental performance of these intermediate products is essential to facilitate the transition to more sustainable food systems including derived products and the PEF method and the related PEFCR should also be recognised as the reference method to support such communication in through labelling, in compliance with existing specific sectorial legal framework for labelling concerning intermediate products.

Our sectors are proud to have partnered with the European Commission to support the development of the PEFCRs methodology (pilot phase) and are currently in the process of updating the 2018 PEFCRs using the most recent set of data provided by the EC. By doing so, we demonstrate our commitment to support the European Union's sustainability strategy, in particular the sustainable food system framework. We would also like to support any additional initiative in favour of PEFCRs practical implementation, including communication to consumers.

Yours sincerely,



[The European Pet Food Association](#)

Alice Tempel Costa, Deputy Secretary General



The Brewers of Europe

[The Brewers of Europe](#)

Pierre-Olivier Bergeron, Secretary General



[Confederation of National Associations of Tanners and Dressers of the European Community](#)

Gustavo Gonzalez-Quijano - Secretary General



[The European Feed Manufacturers' Federation](#)

Alexander Döring - Secretary General



[The European Dairy Association](#)

Alexander Anton, Secretary General