

To whom it may concern,

Please find comments on the communications document below and attached.

- **Suggest there needs to be more explanation and links to the Methodology being developed.** Currently there is limited reference as to how the methodology is intended to support the communication **e.g.** is there a particular communication tool that the methodology supports? How are members of the roundtable to communicate once they have used the methodology? Both strands of the roundtable should be linked together closely. In particular, there needs to be a section in 'Part B' on Environmental Footprint Information – which is the type of information being gathered through the methodology. How does the roundtable see the information being collected under the methodology then communicated? Are you also considering the option of re-consulting on the issue of communication once agreement is reached on the methodological guidance to be used? We consider that both strands need to be closely joined up and done in parallel.

- **Suggest restructure the document so that 'Part B' is upfront or closer to the beginning of the document and section 3.1 of 'Part A' is in an annex.** Although useful, 3.1 of Part A is long and negative about most or all forms of communication and does not provide practical recommendations about how to use it (in contrast to Part B which is more practical). After reading section 3.1 of part A, the impression you get is that no forms of communication are suitable – and as there is a lot of information before Part B I think people may be overwhelmed and not read the whole thing (in which case it would be better to have the most important information upfront). Therefore, 3.1 would work better as a 'reference' or background section in the Annex (supporting the recommendations in Part B). Further contextual information may then be needed in Part B to make this work.

- **The tone of the document could provide more support to the positive role that communication can play.** This point was particularly important in the update to our Green Claims Guidance – what we found most in our consultation with stakeholders is that they wanted helpful and constructive guidance and advice about how to communicate well, rather than strict 'what not to do'. I think we need to recognise that many businesses will want to communicate their achievements, but also that if done well it can play a really important role in driving the market towards more sustainable products (see section 2 of our guidance on *Environmental Claims and Marketing*). This document should be about supporting business when they choose to communicate, and ensuring that they do it in the most effective way. Emphasising what type of information works well and why would be useful.

- Following on from the above point, it **would be helpful if they could consider further the effectiveness of, and the potential benefits that could be realised by using a communication tool, or a combination of communication tools, against the costs** associated to the calculation of the environmental footprint of a product based on the methodology chosen. Is there sufficient evidence to substantiate the effectiveness of a certain form of communication in stimulating behaviour changes? Our recently funded research project on "Effective Approaches to Environmental Labelling of Food Products" (<http://randd.defra.gov.uk/Default.aspx?Menu=Menu&Module=More&Location=None&Completed=0&ProjectID=17104>) looked into this. It is clear from the study that the effectiveness and role of labelling as means to bring about changes in industry and consumer behaviour which results in benefits to the environment is subject to significant uncertainty. This is due to the a lack of monitoring or research to confirm if the scheme does indeed result in improved environmental performance.

Happy to discuss further if you have any questions.

<<Communicating\_environmental\_performance\_along\_the\_food\_chain Defra comments.doc>>

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