

# EUROPEAN FOOD SUSTAINABLE CONSUMPTION & PRODUCTION ROUND TABLE

Report on the public  
consultation and pilot test of  
the ENVIFOOD Protocol



*Version 0.4*

*[28 March 2014]*



## Introduction

Following the release of the ENVIFOOD Protocol version 0.1 in November 2012, the European Food SCP Round Table (RT) launched two processes with the aim of receiving feedback on the methodology and reaching further consensus amongst the LCA practitioners' community on the content of the protocol:

- Public consultation on the ENVIFOOD Protocol: from 21<sup>st</sup> November 2012 to 31<sup>st</sup> March 2013. The Consultation was specially addressed to all stakeholders of the food production chain. Comments were received from 11 participants (see full list of participants in Annex 1) from different affiliations (industry, governments, research institutes, etc.). A total of 144 comments were received through a template following a process similar to the one used for developing international standards.
- Pilot testing: from the 27<sup>th</sup> of March 2013 to the 15<sup>th</sup> of October 2013 with 19 organizations testing the draft Protocol. Participants included a wide range of food and drink manufacturers, trade associations and research institutes (please see full list of participants and products tested in Annex 2). The possibility to test communication tools was also given to pilot testers.

All comments received through these processes were evaluated by Working Group 1 in two steps:

- In July-September 2013 members of the Working Group 1 analyzed and assessed the comments received from the Public Consultation. A detailed list of the comments and the way they were assessed in the updated version of the ENVIFOOD Protocol is available upon request at [info@scp-scp.eu](mailto:info@scp-scp.eu).
- In October 2013 the members of Working Group 1 Drafting Group classified the comments and proposals from testers of the ENVIFOOD protocol following the categories below:
  1. **Comments for immediate change:** Proposals concerning editorial or clarification comments for unambiguous integration in the ENVIFOOD Protocol. These comments were reflected in the ENVIFOOD protocol v 1.0 approved by the RT Plenary in its meeting of 20 November 2013 and made public on 20 January 2014.
  2. **Medium Term - PEF pilot test:** Comments which request further guidance or examples including proposals where there was no immediate consensus. These have been compiled in a separate document to serve as guidance-reference for the ENVIFOOD protocol users.
  3. **Long term:** Comments on structural issues which will require further in depth discussion in future revisions of the protocol.

This report describes in Section 1 the main modifications to the Protocol following the public consultation and the pilot tests. Section 2 addresses the main requests regarding further guidance and examples. The content of Section 2 has been presented and discussed during the workshop organized by the Round Table with pilot testers on 17-18 February 2014. On the basis of the outcome of the workshop additional guidance and examples will be made available so that they can be used during the upcoming EU Environmental Footprint Pilot Phase.

Section 3 deals with comments requiring more time for discussion. These comments have also been discussed during the workshop with pilot testers. The outcome of the discussion will be taken into account for the update of the ENVIFOOD Protocol.

Section 4 provides a brief description of the outcome of the testing of the communication tools

## 1. Main modifications integrated in version 1.0 of the ENVIFOOD Protocol

### 1.1 Main comments

The main comments which led to modifications in version 1.0 were linked to:

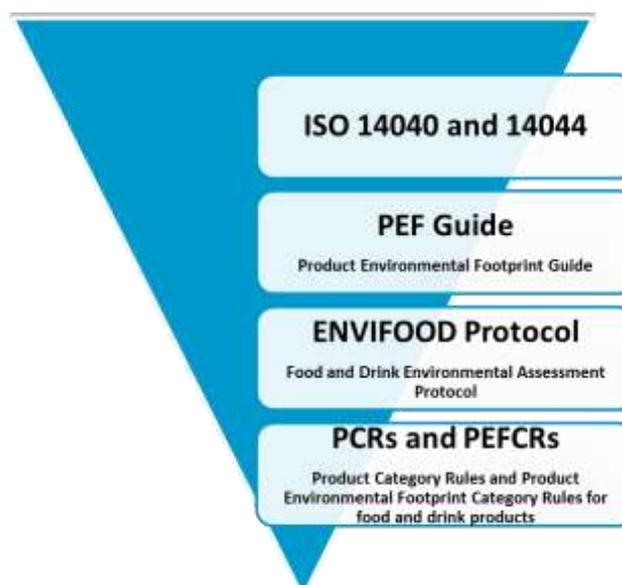
- The need to improve the understanding of the Protocol;
- The need to deal with inconsistencies in the Protocol;
- The need to clarify the relationship with other horizontal methodologies, and especially with the PEF.

### 1.2 Integration of main comments in the ENVIFOOD Protocol

Main modifications to version 1.0 of the ENVIFOOD Protocol are enshrined below.

#### 1.2.1 Clarification of relationship with PEF and other horizontal methodologies

The diagram illustrates the status of the Protocol in relation with other methodologies - in particular the PEF development has been added in the introduction.



Section 2 of the Protocol which describes the relationship of the Protocol with other methodologies has also been significantly reviewed. This section now specifies that: *“Beyond its self-standing application to establish product related environmental information following the guiding principles, the Protocol reveals the basis for coherence and quality assurance at the sector level for a number of international and national standards or proprietary guidance documents on life cycle assessment.*

*Depending on the intended communication, different additional requirements may apply. For these uses, the Protocol serves as guide to set generic requirements in the context of the Food & Drink supply chain and to point to consensus and best practice examples.*

*For the communication of environmental hotspots or of the environmental performance of a product, several tools and methods exist like ISO 14040. The ILCD Handbook (EC, 2010) or the European Commission's Product Environmental Footprint (PEF) Guide (EC, 2013a) also reveal provisions for this purpose.*

*The same holds true for dealing with the environmental performance of organisations which is currently deepened within a standardization process in ISO and also supported in the of Organisation Environmental Footprint (OEF) Guide developed by the European Commission (EC, 2013b).*

*The streamlining of environmental performance communication in form of declarations or indicator profiles requires the establishment of product category rules (PCRs) following ISO 14025 to make use of environmental product declarations (EPD). The European Commission's PEF Guide also refers to PEF Category rules (PEFCR) which can be developed to generate PEF profiles.*

*As the anticipated communication is directed to consumers to allow informed decisions, not all data modelling approaches detailed in the ILCD Handbook are mirrored in the ENVIFOOD Protocol."*

In order to avoid confusion and to complement the existing annex describing the areas where the Protocol provides further guidance to ISO 14044:2006 and the PEF Guide, a new Annex has been introduced to highlight the areas where the PEF Guide provides additional guidance to the Protocol. Finally a clarification statement has been added to the scope section of the Protocol. This statement clarifies that in case of contradiction for assessment undertaken in the context of ISO 14040/44 and the PEF Guide, such documents overrule any requirements in the ENVIFOOD Protocol.

### **1.2.2 Clarification of the role of Product Category Rules**

The ENVIFOOD Protocol brings additional guidance in comparison with horizontal methodologies. However in view of certain applications like product labelling and B2C communication, the ENVIFOOD Protocol prescribes the development of product category rules for feed, food in order to fix modelling aspects on product group level. The importance of developing such PCRs has been strengthened in version 1.0 of the Protocol.

*When accompanied by PCRs, the Protocol provides guidance to support:*

- *The development of consistent environmental assessments of intermediate products in the context of business-to-business, and of consumer products in the context of business-to-consumer communication (focus of Working Group 2 of the Food SCP Round Table);*
- *The identification of environmental improvement options (focus of Working Group 3 of the Food SCP Round Table)*

### **1.2.3 Clarification of target audience**

It is now specified that the ENVIFOOD Protocol is primarily targeted towards environmental managers and LCA experts.

### **1.2.4 Technical clarifications**

In addition to the previous elements, some technical clarifications have also been incorporated in version 1.0 of the ENVIFOOD Protocol:

- Regarding the functional unit and the unit of analysis for B2B and B2C related applications;
- Regarding data quality requirements and assessment of data quality;

- Regarding the impact assessment. It is now specified that the Protocol provides a default list of potential impacts whose significance shall be assessed against the criteria already proposed in the Protocol. Links to characterisation factors have also been added.

## **2. Request for additional guidance or examples**

During the pilot test, several requests were expressed for additional concrete guidance or examples. These requests do not challenge the recommendations proposed in the ENVIFOOD Protocol but express a need for complementary elements in order to make the implementation of the ENVIFOOD Protocol easier. These elements have been discussed during the workshop with pilot testers and will be made available on the Round Table's website during the course of 2014.

### **2.1 PCR development**

It has been suggested to facilitate the development of PCRs through further harmonisation with existing guidance such as the Product Category Rule Guidance Development Initiative. The discussions during the workshop led to the conclusion of applying a modular approach. A modular approach means that for cross-cutting issues across food and drinks products a default approach will be proposed. These modules can either be used as starting point for PCR development (with or without modification) or as default reference in the absence of PCR. These 'defaults' or standard approaches are to be developed by the WG1 and to be proposed to all members before being submitted to the SC for final approval. Deviation from these default approaches is possible but it will need to be justified.

### **2.2. Requirements and intended applications**

It has been proposed by some pilot testers, and confirmed during the workshop, to include in the Protocol a matrix showing the degree of flexibility regarding requirements and intended applications, such as in the PEF Guide.

### **2.3 Land Use Change**

Several pilot testers requested to include examples to the micro and macro level approaches for Land Use Change. The access to the Land Use Change calculation developed in the framework of the PAS 2050-1 could also be facilitated. These suggestions were approved by the participants in the workshop who recommended providing a link to the calculation tool, including a description of the main features of the tool.

### **2.4 Aspects not specific to food and drinks**

Several pilot testers called for facilitating access to characterisation factors, as well as facilitating conversion from one LCI data format to another (Ecospold vs. ILCD format). This goes beyond the scope of the ENVIFOOD Protocol since these aspects are not food and drinks related. The participants in the workshop concluded that there was no need to provide a document, but just to provide the right access to the links.

### 3. Comments to be addressed for the update of the ENVIFOOD Protocol

The public consultation and the pilot test of the ENVIFOOD Protocol raised some remarks which deserve to be further discussed by the RT. They are listed below:

- Definition of system boundaries
- Data
  - o Requirement regarding primary data
  - o Provide recommendation on how to assess uncertainty
  - o Facilitate access to default background data
- Impact assessment
  - o List of impact categories is too long and not relevant for food and drink products
  - o Some impact assessment methods are not ready for practical implementation
  - o Classify impact categories as mandatory or voluntary
- Normalisation, weighting and single score indicator
- Reporting
  - o Provide a template for final report
- Need to address specifically agriculture and fisheries, as critical parts of life cycle of food and drink products
- Use of LCA
  - o Need to raise awareness before providing LCA guidance
  - o Need to develop guidelines on how to use LCA for reduction of environmental impacts
- Need to develop an ENVIFOOD Protocol for organisations

### 4. Testing of communication tools

A few organisations have submitted replies to the questionnaire prepared by the SCP Roundtable but they have not done any testing of communication tools based on the results/application of the ENVIFOOD Protocol. While certain organisations consider that a testing of communication tools is feasible and their perception is positive, others underlined certain challenges, such as the lack of a unique standard, or that the general audience would not be very interested.

Only one third of the organisations (6 out of 18) participating in the ENVIFOOD Protocol testing responded to (some) questions concerning the part on communication tools. For this reason, this assessment can be only seen as a very provisional assessment.

- Several organisations referred shortly to some previous experiences on environmental communication. They also referred to some initiatives where they carried out environmental communication based on EPD (Environmental Product Declaration); some other ones have not yet done in this way, although they may consider doing in the future.
- In most of the initiatives mentioned, the geographical scope was limited to the national level, while one organisation referred to an initiative covering several countries.

- Some organisations declared it would be feasible to continue environmental communications on a permanent basis. While for other companies/organisation they see that this would be too costly and they prefer to apply the tools on an ad hoc basis.
- Most pilot testers were willing to continue the process in order to support informed choices for consumers, avoiding misleading information and creating a level playing field for businesses.

## **Annex 1: Public consultation – list of participants**

- JRC
- Defra
- Soltub
- SIK
- ESU Services
- ANIA
- AFNOR
- MEDDE

## **Annex 2: Pilot test – list of participants**

- Granarolo (Italy)
- Carlsberg Italia
- Campden BRI (Hungary)
- European Bottled Water Federation
- Coop Italia
- Nestlé
- UNESDA
- Federacion Espanola del Vino
- Barilla
- Re-Ma MEDIO AMBIENTE
- CTME
- Swedish Institute for Food and Biotechnology
- Primary Food Processors
- Gallina Blanca Star
- FEFAC
- FEDIAF
- FERRERO
- Mondelez International