



European Food SCP Round Table

Consultation Follow-up: Feedback from Stakeholders and Round Table Comments

3 June 2010



Section	Name of Organisation / Individual / Public Authority	Email	Consultation Feedback	Round Table Comments
General	European Environmental Bureau	doreen.fedrigo@eeb.org	<p>We are pleased to see attempts to establish a harmonised European framework methodology for the environmental assessment of food and drink products, particularly as food and drink (particularly meat, cheese and milk), in other words, what we eat, is one of the three areas where our consumption and production patterns have the largest negative environmental impacts. Increasing illnesses due to our dietary habits also make food and drink a source of negative health impacts. In other words, our food and drink production and consumption patterns are unsustainable. Discussions on how to improve EU agricultural practices and policies have been ongoing for decades, with strong resistance to sustainability innovation from private interests and an unwillingness to address the serious environmental impacts of farming on environmental degradation and ecosystem breakdown. The Round Table can help to break these blockages, or it can reinforce them by hiding behind calls for scientific 'reliability'. Environmental organisations also support the use of science in political decision-making, but recognise that science has its limits and it needs to be considered within the context in which it is being used. This means that political decisions will likely always need to go beyond scientific knowledge, and will not always be based purely on this knowledge. One of our concerns is the absence of recognition in the Guiding Principles document of the potential of the environmental assessment methodology to help shape future policies. The assessment methodology is linked only to consumer information, which we consider too narrow a focus for effective impact on improving agricultural practices extending as far as food and drink production. It is not clear from the Guiding Principles document, or from other supporting documents, the role of the European Commission in this Round Table, apart from co-chairing. It is also not clear whether the Round Table is being seen as an alternative or a complement to more formal, official policy-making activities. Best practices in agriculture, such as in Integrated Production (or Integrated Pest Management) could be highlighted in communication to the public and to the supply chain. Integrated Production (IP) will need to be implemented by 2014 according to the Directive on the Sustainable Use of Pesticides, so there are strong links to SCP in food and drink products. Implementing IP will mean contributing to all sustainability topics such as biodiversity, pollution, climate, and health.</p>	<p>According to the mandate of the RT, the objective of the working groups responsible for the Guiding Principles was to "develop 'principles' on the environmental assessment of food and drinks as part of the overall 'RT principles on environmental assessment and voluntary environmental communication on food and drink products'".</p> <p>The Round Table (RT) insists on using scientific knowledge as the basis for its work to make sure that the environmental assessment is accurate and reproducible and to ensure consumer trust.</p> <p>The broader strategic questions raised by EEB will be redirected to the Steering Committee.</p>

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	Swedish Institute for Food and Biotechnology	Thomas.Angervall@sik.se	We agree to the general principles when presented "one at a time". However, one should not underestimate difficulties marrying all these principles - there might even be inherent conflicts that have to be dealt with. One such difficulty could be to combine principle 8 "Ensure that all food chain actors can apply the assessment methodology and communication tools without disproportionate burden" with a number of the other principles.	The RT recognizes this difficulty and will continuously improve the methodology.

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	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	<p>Related to environmental assessments</p> <p>Understanding and analysing life-cycle aspects of food product value chains is not only important to gain effective environmental information. It can also be the first step for manufacturers, producers and retailers to capitalise the opportunities that can be found by strategically addressing environmental (and social) impacts. Many businesses are beginning to understand sustainable products and services as a framework for driving growth, increasing shareholder value and increasing stakeholder satisfaction while at the same time reducing environmental and socio-economic risks within their business models.</p> <p>Therefore, the CSCP suggests to the Food SCP Roundtable to consider – besides the voluntary environmental assessment and the communication of environmental information – also the possibility for stakeholders along the food chain to respond to the identified challenges themselves. Targets of such improvement measures could be set towards “Zero-Hot-Spots-Food-and-Drink-Products”, i.e. towards eliminating those changes to the environment (and social circumstances) that have the greatest environmental (and social) impacts and for which the most feasible improvement options exist.</p> <p>Communicating the environmental information as well as the conducted activities for improvement will even make a stronger case to help consumers and other stakeholders along the food chain to make informed choices. Becoming a “Zero-Hot-Spot-Company” could also be very beneficial e.g. because of opportunities to enter green markets or to improve customer relations.</p> <p>The CSCP together with the Wuppertal Institute has developed a so-called “Sustainability Hot-Spot Toolbox”, that assists companies to identify measures that are not only addressing the most significant environmental (and social) impacts, but are also evaluated for their feasibility. This methodology is currently applied by major European retailers, such as the REWE Group.</p> <p>Related to environmental communication</p> <p>Communication in the supply chain (B2B) varies from communication to consumers (B2C). The challenge in view of consumer communication also involves understanding what the consumer requires and expects, and what could inspire behavioural change. Discussion and possible specification on this might be needed.</p>	<p>An RT working group (3) is dedicated to promoting continuous environmental improvement.</p> <p>The RT agrees that the methodology, which will be developed during the second stage, will serve as a useful tool to identify “hot-spots” and improvement areas.</p> <p>The RT acknowledges the comment made on communication. See principle 5 – “Provide information in an easily understandable and comparable way so as to support informed choice”.</p>

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	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	<i>Do you have any comments on the "Principles for both voluntary environmental assessment and communication"? Environmental (and social) assessment and information need to address both, production (upstream) and consumption (downstream).</i>	Yes, the RT will take both upstream and downstream into consideration. Social issues are outside of the scope of the methodology being developed according to the mandate. An RT working group (4) is dedicated to considering the non-environmental aspects of sustainability that may interact with the work of the RT.
Background	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	Environment in the sustainability context <i>Consider changing the notion of that paragraph (and the following text) to further take account of the social (including health and safety) dimension.</i>	The main focus of the Round Table is on environmental sustainability. Social and economic aspects of sustainability will be taken into consideration in the pursuit of the Round Table's environmental objectives.
	Swedish Institute for Food and Biotechnology	Thomas.Angervall@sik.se	We agree to the statement that the framework methodology shall be practical to use and shall avoid disproportionate burden or costs on the various food chain operators, while being scientifically robust. However, as one of the major R&D organisations working with the environmental impact in the food chain, we are aware of the methodological work that remains to be done before this objective can be obtained and that scientific achievements will constantly call for revisions of both methods and data. These aspects are worth mentioning in the background.	This is addressed in principle 4 – "Periodically review and update the environmental assessment".

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	French Sustainable Development Ministry	Sylvain.Chevasus@developpement-durable.gouv.fr	<p>“This situation has the potential to confuse or even mislead consumers and other stakeholders and to lead to unnecessary burden for food chain operators. It can be borne in mind, however, that the assessment and communication of the environmental performance of food and drink products <i>can make an important contribution to the EU’s environmental protection and SCP objectives while it</i> must comply with all existing Community rules laid down in the EU treaty, including those on the free movement of goods, and in secondary EU legislation, such as the rules aimed at protecting consumers against misleading and deceiving information.”</p>	<p>The RT agrees with the suggested sentence and will add it to the first paragraph of the objectives of the principles, as this is a more appropriate place for the statement.</p>

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	People 4 Earth	mieke@people4earth.org	<p>Background Chapter: There is a difference between impacts and 'compliance'.</p> <p>A lot of labels (for instance Rain forest Alliance, MSC, FSC) are about compliance with criteria. Is there a difference treatment for this two different type of assessments and communication forms. Note: There are good governance rules for this kind of respected standards (within ISEAL).</p> <p>Why only environmental and not the complete framework of sustainability???</p> <p>To develop an harmonized environmental assessment methodology it is maybe good to look at the value chain of a product.</p> <p>I miss in the background chapter the clear responsibility of the 'owner' of the product (brand owner or private label owner). If you talk about good information, you talk also about 'responsible' choices in the value chain. Full Traceability for instance is an important element.</p>	<ol style="list-style-type: none"> 1. The Guiding Principles already address quantitative and qualitative communication in the principles (see the "Definitions" section and Principle 6 – if "quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensuring consistency and comparability so as to support informed choice"). Further explanation is needed on "different treatment". 2. The mandate of the RT is to focus on the environmental aspect of sustainability. 3. A key feature of the RT is its involvement of the whole food value chain. Principle 1 states that operators shall identify and analyse the environmental aspects at all life-cycle stages. 4. EU legislation addresses the question of responsibility and that is outside of the scope of the mandate. Shared responsibilities are addressed in the first sentence of the background section. Also see Principle 7 on ensuring "transparency of information and underlying methodologies and assumptions".

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Questions to be considered in the process	Bob Schmitz	bobschmitz@compuserve.com	<p>- <i>"What costs and benefits are involved as well as what challenges are the various food chain operators, including SMEs, facing or going to face in this respect ?"</i></p> <p>A key question is the availability and use of primary and/or secondary data as highlighted in the draft Belgian Government Memorandum on "Affichage environnemental des produits de grande consommation". This basic question is not addressed in the draft guidelines. Reference is made to the <i>"use of standardised data sets should be facilitated whenever possible"</i> (cf. Principle 3). What is exactly meant by this, does it refer, for instance, to ELCD ?</p> <p>- <i>"What kind of information is relevant for consumers? How can consumer confusion be avoided ?"</i></p> <p>BEUC, the EU consumer umbrella organisation, is not participating presently. Different recent consumer association research and studies are, however, available. Has the Round Table accessed these findings? If not, why not?</p> <p>- <i>"What is already available at the European level to help assess and communicate the potential environmental impacts associated with the production and consumption of food and drink products? "</i></p> <p>The recent Regulation (EC) No 66/2010 on the EU Ecolabel concluded that <i>" the Commission shall undertake a study, by 31 December 2011 at the latest, exploring the feasibility of establishing reliable criteria covering environmental performance during the whole life cycle of food (drinks) and feed products."</i> Will progress of the Round Table in the second phase concerning methodologies, depend on these EU conclusions? If not, why not?</p>	<p>Regarding the use of primary and/or secondary data, such methodological questions will be dealt with during the development of the framework assessment methodology. Yes, ELCD is an example of a standardised data set that could be used.</p> <p>Yes, the RT will take into account various studies and consumer research, including BEUC's and the forthcoming EU Eco-label study.</p> <p>Principle 4 states that the environmental assessment will be periodically reviewed and updated to take into account innovation, new data and improvement in assessment methodologies.</p>
	Paddy Doherty Impacts Manager ISEAL Alliance Vancouver, Canada	paddy@isealalliance.org	I support the voluntary and harmonised approach, though the term harmonised is sufficiently vague to be interpreted in radically different ways. I am wondering where is the "common framework assessment methodology"--or are the guiding principles meant to be the common framework assessment methodology?	The framework assessment methodology will be developed in the second stage, as foreseen by the mandate.

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	People 4 Earth	mieke@people4earth.org	<p>Assessment methodology: Is it really about developing a smart assessment methodology (and is it possible to derive this from LCA?). Or is it also about a system to gather easily and consequent environmental information about the product from the partners in the product chain. For instance there is a development called 'Earthster' (Greg Norris) who is developing a web system to gather LCA data from cradle to gate. This is an independent initiative that could work as 'framework' for collecting data. Earthster is also working with the Wallmart Consortium. This solves a little bit the problem of the SME's problem.</p>	The RT is taking into account various initiatives, including the Sustainability Consortium and Wal-mart Consortium.
Definitions	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	<p>Life-cycle of food and drink products <i>Consider as additional aspect:</i> The main life-cycle phases might need to be defined differently according to the product group in question. Seasonal aspects (e.g. for fruits and vegetables) could be taken into account as well. Environmental aspects <i>Consider as additional aspects:</i> To ensure comparability and transparency, certain "main environmental aspects" could be set, such as water consumption, land use/biodiversity, waste, emissions to air, emissions to water, energy consumption, material consumption, and greenhouse gas emissions.</p>	These methodological considerations will be discussed by the RT during the second stage, when the framework assessment methodology is being developed.

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	EEA	almut.reichel@eea.europa.eu	<p>We noticed that there has been a discussion and decision to take out, from the guiding principles, land as an example for inputs in the definition of the term ,environmental aspects’.</p> <p>In our work on environmental aspects of consumption and production, the EEA considers land as an important environmental aspect, and we are currently working on developing land accounts. These land accounts are a first step to assess product-related environmental impacts on land in terms of land cover consumption (e.g. wetlands converted to cropland). The second step is the introduction of coefficients based on land use intensity (e.g. from agriculture statistics) and ecosystem impacts (e.g. biodiversity loss). Land accounts for Europe have been produced for 1990-2000 and 2006. http://www.eea.europa.eu/publications/eea_report_2006_11. The 2006 update is available at the EEA.</p> <p>In addition, European “virtual land use” for agriculture products (imports minus exports) has been computed for 1995 to 2005: http://eea.eionet.europa.eu/Public/irc/eionet-circle/leac/library?!=/virtual_land_2009/1995-2005-final-manuel/ EN_1.0 &a=d.</p> <p>Therefore we think that land should be taken into account as an important aspect especially in the food and drink chain. We will be happy to explain our work and how it could contribute to the Food SCP RT in more detail.</p>	<p>The examples provided are not supposed to prejudge the work on the methodology or the environmental aspects/impacts that will be included in the methodology.</p> <p>We welcome and look forward to your contribution.</p>
	FEDIOL/PFP	cblomsma@fediol.be	<p>I understand the revised principles now include the proposal by the LCA expert group on the definition of environmental aspect and impact. I just wondered how I should read the following sentence (see definition of env impact): “Environmental issues of concern to which environmental aspects may be assigned are called impact categories”.</p>	<p>Reference should be made to ISO as this has been taken from ISO 14044. LCA experts have provided further explanation to FEDIOL/PFP.</p>
	Swedish Institute for Food and Biotechnology	Thomas.Angervall@sik.se	<p>Page 4: Rephrase the environmental impact “global warming” to “climate change”</p>	<p>The RT agrees with this suggestion and will change “global warming” to “climate change”.</p>

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	People 4 Earth	mieke@people4earth.org	<p>What is the definition of environment (scope: does it include biodiversity? does it include animal welfare?)</p> <p>Product category Define what a product category is extremely important. Is it within the category breakfast or within the category bread. -> who chooses?</p>	<p>The scope of the environmental assessment and methodological considerations will be discussed by the RT during the second stage, when the framework assessment methodology is being developed.</p> <p>An RT working group (4) is dedicated to considering the non-environmental aspects of sustainability, including animal welfare.</p>
Lead principle	BASF	christoph.guenther@basf.com	<p>The following section (in red) of the Lead Principle is inappropriately placed:</p> <p><i>Information shall be relevant, addressing the significant environmental impacts related to the product life-cycle. Where communication of environmental information is limited to individual environmental aspects or impacts along the life cycle, or to specific life-cycle stages, the scope and meaning of the provided information must be specified in a clear, accurate and unambiguous manner. In particular, such information shall not be presented as reflecting the overall environmental performance of the product. If in such cases quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensure consistency and comparability.</i></p> <p>This section in red conflicts with the main point of the Guidance Document, which is that environmental assessments should be comprehensive and cover the complete life cycle. Communication of environmental performance limited to individual environmental aspect or impacts or to specific life-cycle stages, should be avoided; if it cannot be avoided, then it should follow the rules as described. However, this section should be noted as an exception in the appropriate principle (Principle 6).</p>	<p>The wording in the Lead Principle and in Principle 6 pertains to single-issue communication, not assessment. Operators shall assess the environmental aspects and significant potential environmental impacts at all life-cycle stages, as per Principles 1 and 2. Principle 6 further specifies that "the communication must not emphasise one single environmental aspect or impact if this creates the wrong impression of reflecting the product's overall environmental performance along its life-cycle. In addition, it must not hide negative environmental trade-offs along the product life-cycle".</p>

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	European Environmental Bureau	doreen.fedrigo@eeb.org	The lead principle does not mention the environmental assessment aspect of the Round Table's overall objectives. Therefore it should include wording along the lines of: "A harmonised framework methodology for the environmental assessment of food and drink products shall be transparent, independently verified, understandable, freely available, and used as a basis for environmental information communicated along the food chain."	<p>The methodology will be developed in an open and transparent process and will be freely available to all. Transparency is important, and rather than including it in the lead principle, it has its own principle (Principle 7), which states that operators must "Ensure transparency of information and underlying methodologies and assumptions".</p> <p>The independent review of the framework assessment methodology will be put to the Steering Committee. In the second phase, the RT will consider the conditions for independent peer-review of the environmental assessment and communication of food and drink products.</p>
	People 4 Earth	mieke@people4earth.org	I miss independently verified or accorded.	Same as above.
P1 Identify and analyse the environmental aspects at all life-cycle stages	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	<p>Principle 1: Identify and analyse the environmental aspects at all life-cycle stages</p> <p><i>Consider as additional aspect:</i> Life-cycle data must be well-documented in an appropriate format to ensure clarity, transparency and traceability of the information.</p>	The transparency of information and underlying methodologies and assumptions is addressed in Principle 7.

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<p>P2 Assess the significant potential environmental impacts along the life cycle</p>	<p>UN Development Programme</p>	<p>Andrew.BOVAR NICK @undp.org</p>	<p>I have 3 recommendations for the principles to be more explicit to ensure due reporting at food production level – ie at farm level, as currently I can see a risk of reporting at a very minimal level at this stage which can have the greatest environmental impacts.</p> <ol style="list-style-type: none"> 1. State explicitly data is required from farm level. 2. Decide whether the reporting should be about conditions or activities influencing the conditions – ie water or the level of chemical application or run-off 3. If conditions then state in the principles the main environmental conditions that should be reported on – water, soil, biodiversity, carbon. 	<p>These methodological considerations will be discussed by the RT during the second stage, when the framework assessment methodology is being developed.</p>
	<p>UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)</p>	<p>nora.brueggemann @scp-centre.org</p>	<p>Principle 2: Assess the significant potential environmental impacts along the life-cycle <i>Consider as additional aspect:</i> Those life-cycle phases and environmental aspects with significant (i.e. greatest) adverse environmental (and social) impacts (so-called hot-spots) could then be assessed by internal and external interested parties, since these often hold different perspectives and views regarding the relevance of a given impact or life-cycle phase. The stakeholder perception gaps should be evaluated to conduct a reality check and to ensure the applicability of the scientifically reliable data. The outcome of the stakeholder perception shall be rated together with the scientific findings.</p>	<p>The mandate of the RT is to focus on the environmental aspect of sustainability. An RT working group (4) is dedicated to considering the non-environmental aspects of sustainability, including social impacts.</p> <p>It is difficult to integrate stakeholder perceptions into the environmental assessment.</p>
<p>P3 Apply recognised scientific methodologies</p>	<p>European Environmental Bureau</p>	<p>doreen.fedrigio @eeb.org</p>	<p>The 3 principles include 2 of the “3Cs” on public information from consumer research, those of “clarity” and “comparability”. The 3rd of these principles is “credibility”, based on consumer demands to have realistic, accessible and verifiable information.</p>	<p>The credibility of the RT is addressed by having most of the major stakeholders around the RT, including the European food value chain, European Commission, UN Environment Programme, European Environment Agency and European Environmental Bureau, and being open to stakeholders. Principle 7 states that all data sources shall be credible.</p>

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P4 Periodically review and update the environmental assessment	European Environmental Bureau	doreen.fedrigio@eeb.org	The 4 principles cover most of the key activities needed for assessment of food and drink products, and we are particularly pleased to see that a review and update principle is included. It is not clear how often a “periodical” review and update is anticipated – whether every 3 years, 5 years, 10 years, or beyond. We presume this will be decided according to the need for review and update against existing data availability and scientific knowledge.	The frequency of periodic reviews will be addressed in the RT’s roadmap for establishing a framework assessment methodology.
	UNEP/Wuppertal Institute Collaborating Centre on Sustainable Consumption and Production (CSCP)	nora.brueggemann@scp-centre.org	Principle 4: Periodically review and environmental assessment <i>For the frequency of the conducted reviews the pace of environmental change (e.g. due to climate change or events having a major impact on certain product categories) should be taken into consideration in addition to the pace of innovation.</i>	Yes, it will be taken into consideration, as this would fall under “other significant changes along the supply chain”.
P5 Provide information in an easily understandable and comparable way so as to support informed choice	European Environmental Bureau	doreen.fedrigio@eeb.org	One missing principle is that of transparency – in the presentation of the assessment (explanations of assumptions, boundaries, studies used for impact figures), and in the availability of the assessment documents to the public, beyond Principle 5 under voluntary environmental communication. The source of data to be used in public communication on the products should also be available for external analysis, regardless of whether it is finally used for such voluntary communication.	Principle 7 is dedicated to transparency. It states, “Environmental information shall be transparent. i.e. Information concerning the assessment, procedure, methodology, data source, criteria, underlying principles, assumptions and boundary conditions shall be available to all interested parties on request ...”
	French Sustainable Development Ministry	Sylvain.Chevasus@developpement-durable.gouv.fr	Different means and formats of communication can be used for different products and for different recipients at different stages of the food chain (e.g. formats to communicate with consumers (B2C) may differ from those aimed at customers along the food chain (B2C) or at public authorities). Efforts shall be made to work towards harmonisation within individual formats (e.g. to avoid a proliferation of different graphics or symbols). For this purpose, the Round Table will develop guidelines on communication aspects and will encourage users to apply the option that will be selected by the guidelines as most efficient and most prone to widespread use and harmonisation.	The RT can accept “shall” as the meaning is similar and it is, for editorial reasons, more consistent with the whole document. Regarding the text in red, the RT’s mandate is to develop recommendations on the use of suitable tools for voluntary environmental information on food and drink products to consumers and other stakeholders following an evaluation of the advantages and disadvantages of existing and emerging communication tools.

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<p>P6 Ensure clarity regarding the scope and meaning of environmental information</p>	<p>Bob Schmitz</p>	<p>bobschmitz@compuserve.com</p>	<p>Recently BEUC and EEB stressed that the environmental impact differences (based on LCA) between competing products are mostly insufficiently significant to justify meaningful consumer information concerning comparative merits. No such a warning appears in the draft guidelines nor any recommended minimum margin for communicating differences in public.</p> <p>The difference from using primary and secondary (average) data is not addressed. If comparable products offered on the shelves use either primary or secondary data or a mix of both (depending on each operator's decision), the consumer is likely to be misled.</p>	<p>The RT understands that this comment is not necessarily criticising LCAs, but rather stating that LCA is not always sufficient for capturing small differences between products. Recommendations for communicating environmental information will be addressed in the next phase.</p> <p>The RT will also address the use of primary and/or secondary data in the second phase of the work, when developing the framework assessment methodology.</p>

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	BASF	christoph.guenther@basf.com	<p>Suggested changes: delete red section from Lead Principle (see above) expand Principle 6 with blue text to:</p> <p><i>Principle 6</i></p> <p><i>The communication of environmental information to food chain partners and to consumers shall reflect the scope of the underlying assessment of significant environmental impacts along the life-cycle. Communication of environmental information that is limited to individual environmental aspects or impacts along the life-cycle, or to specific life-cycle stages should be avoided.</i></p> <p><i>Where the environmental information is limited to individual environmental aspects or impacts along the life-cycle, or to specific life-cycle stages, the scope and meaning of the provided information shall not be presented as reflecting the overall environmental performance of the product. This clarification could, for instance, take the form of a clarifying statement and/or an unambiguous design of graphics and labels or via other means and channels of communication. It shall be easily accessible fo the food chain operators or the consumer. If in such cases quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensure consistency and comparability so as to support informed choice.</i></p> <p><i>In addition, and in accordance with ...</i></p>	Please see our response to the previous comment from BASF on page 11.

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	French Sustainable Development Ministry	Sylvain.Chevas@sus@developpement-durable.gouv.fr	Where the environmental information is limited to individual environmental aspects or impacts along the life-cycle (eg carbon), or to specific life cycle stages, the scope and meaning of the provided information must be specified in a clear, accurate and unambiguous manner. In particular, such information shall not be presented as reflecting the overall environmental performance of the product. This clarification could, for instance, take the form of a clarifying statement and/or an unambiguous design of graphics and labels or via other means and channels of communication. It shall be easily accessible and understandable for the food chain operators or the consumer. If in such cases quantitative environmental information is presented, it shall be based on the corresponding section of the framework assessment methodology with a view to ensure consistency and comparability so as to support informed choice.	For readability, the RT has decided to limit the use of examples. The suggestion to add "and understandable" has been taken up.
P7 Ensure transparency of information and underlying methodologies and assumptions	European Environmental Bureau	doreen.fedrigo@eeb.org	<p>Principle 7 addresses transparency in the underlying methodologies and 4 of 4 assumptions, which we presume does not necessarily mean (but also does not preclude) access to the environmental assessment documents.</p> <p>Comparability implies that information is presented in the same way by different companies, so that their products can be compared like-for-like with another company's products. The voluntary nature of the Round Table objectives means that consumers could end up being given similar but not totally comparable, and therefore potentially confusing, information, including labels and statements. One other principle should therefore require the development of a harmonised communication methodology, which companies should use if they voluntarily decide to provide environmental information.</p>	Our mandate is to develop recommendations on the use of suitable tools for providing voluntary environmental information on food and drink products to consumers and other stakeholders.
P8 Ensure that all food chain actors can apply the assessment methodology and	Bob Schmitz	bobschmitz@compuserve.com	Equal opportunities for all operators (Principle 8) : Related to the above comment on data availability and the question whether use of primary versus secondary data shall be freely allowed to operators or whether some common rules should establish which data may / may not be used for public environmental communication. Within the supply chain, full freedom shall be safeguarded to allow competition between operators at all levels of the chain.	The RT will address the use of primary and/or secondary data in the second phase of the work, when developing the framework assessment methodology.

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communication tools without disproportionate burden	European Environmental Bureau	doreen.fedrigio@eeb.org	<p>The principles of application and continuous improvement are key, to ensure as wide a take-up for consistency and comparability, and to ensure improvements are made. Despite this, we have a number of concerns with these principles.</p> <p>Firstly, Principle 8 proposes limits to procedures and requirements for assessment so that companies of all types, including SMEs, can assess their products. We are concerned that this could limit the assessments so much that it either renders the assessments mostly empty of information, or limits them in scope of environmental impacts. A narrowed scope could end up addressing only those issues where consumer interest is deemed strongest, for example on climate change, even though this is not the biggest environmental impact of the product. Given that all the industry members of the Round Table are federations, we consider that collective activities are possible, so that different sized companies can share the costs of assessments (although we recognise the limits of assessing different products), in order to be able to put as much detail into the assessments as possible.</p>	The RT notes and recognises this comment. These observations will be considered by the RT as a key part of our work.
P9 Support innovation	European Environmental Bureau	doreen.fedrigio@eeb.org	<p>Secondly, Principle 9 is very vaguely worded as "Support innovation". We support the promotion of innovation that improves a products environmental performance along its lifecycle, as is suggested in longer explanation of the Principle, but question the inclusion of improving "the overall performance of the product". One of the reasons for our increasing environmental impacts and growing ecological footprint is the proliferation of products, often at reduced cost, which means increasing consumption. Product innovation presented as improving "overall performance" cannot add to these unsustainable consumption and production patterns, so all innovations should be to improve the environmental performance of products, or their social performance (sourcing of materials, types of materials used, worker conditions, etc.).</p>	Principle 9 now clarifies that the statement refers to promoting innovation to improve the environmental performance of the product.

Section	Name of Organisation / Individual / Public Authority	Email	Consultation Feedback	Round Table Comments
P10 Safeguard the Single Market and international trade	Bob Schmitz	bobschmitz@compuserve.com	The Guiding Principles should specify at the very least that for public communication, assessment must be based on average European (or international) usage patterns ¹ , that where supply processes are organised on the basis of major regions, this must be reflected in the accounting and reporting process (for instance, European power mix) ² and that, as a general rule, data and information shall be representative as far as possible of the entire Community market and be based on life cycle data and quantitative environmental impacts, where applicable in compliance with the European Reference Life Cycle Data Systems (ELCD). ³	Methodological questions will be addressed in the second phase, when developing a framework assessment methodology.
	French Sustainable Development Ministry	Sylvain.Chevasus@developpement-durable.gouv.fr	We also suggest to write in a more balanced (importance of the environmental objective) and positive way Principle 10 whilst retaining the main idea (respect of EU and WTO rules): Protect the environment while Safeguard the Single Market and international trade Procedures and requirements for the voluntary environmental assessment of products and voluntary communication of environmental information have as main objectives environmental protection, consumer awareness, the shift towards more sustainable consumption and production patterns and the promotion of green growth. They shall not be prepared, adopted, or applied taking into account with a view to, or with the effect of, creating distortions of competition, unjustified obstacles to international trade or to the proper functioning the rules of the Internal Market in the European Union and of the WTO. The current development of international and EU standards on the environmental assessment and communication of products and the multiplication of national initiatives, public and private, in Europe, Asia, America and further, will help to promote a smoother articulation between the two legitimate objectives of free trade and environmental protection.	The Round Table has changed Principle 10 to more accurately reflect Article XX of GATT and to acknowledge Internal Market rules.

¹ German Federal Government Memorandum on Product Carbon Footprint, December 2009

² idem to footnote 1

³ EU Ecolabel Regulation Annex I point 2 indents 5 and 6