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Report Highlights:

The goal of this report is to explain EU initiatives to harmonize methods for measuring product environmental footprints (PEFs) and to establish sector specific rules governing their use.

The EU Environmental Footprint Initiative

How does the EU evaluate and compare the environmental impact of different products? To help answer this question, on April 9, 2013, the European Commission (EC) published the Communication “*Building the Single Market for Green Products*” accompanied by the *Recommendation* on the use of Product Environmental Footprint (PEF) and Organization Environmental Footprint (OEF) Common Methods to measure and communicate the life cycle environmental performance of products and organizations. Through these efforts, the EC is working to develop standards for measuring the environmental performance of products and organizations across all Member States (MS). By harmonizing existing measures, policymakers can help reduce confusion among consumers about environmental information, increase comparability among diverse products, and increase the readiness of consumers to invest in green products.

The common methods presented by the EC for evaluating environmental footprints are based on the multi-criteria, supply-chain-wide Life Cycle Assessment (LCA) paradigm ([ISO 14040-44](#)). The LCA framework takes into account the environmental impacts at all stages of the product life cycle including the collection of raw materials, manufacturing, repair, and eventual disposal. Because of its comprehensive nature, LCA is able to account for the effects of any standards already in force in the MS and accurately capture the environmental footprint of both products and organizations.

Development of the PEF Initiative

The PEF initiative was conceived after the EC concluded a study on Product Carbon Footprint methods. After analyzing existing methodologies, the study found that focusing solely on carbon emissions is problematic for many product categories because it would ignore other serious environmental impacts. Building on this finding, the EC resolved to pursue a more balanced approach to evaluating the environmental impact of products. Launched in 2011, the EC tested the new PEF guidelines through a pilot program with the goal of developing a harmonized footprinting methodology that accommodates environmental performance criteria. This program was limited to 10 participants and covered a variety of sectors, including agriculture. The results from this testing were used for the development of the [final technical guide](#).

Rules of the Game

In addition to establishing the PEF methodology, the EC went a step further to write Product Environmental Footprint Category Rules (PEFCRs) and Organization Environmental Footprint Category Rules (OEFCRs) that provide guidance for specific product categories. PEFCRs are developed by the stakeholders in a sector through a consensus process. Originally tested in the [paper sector](#), PEFCRs will increase both the consistency and reproducibility of PEF studies by setting clear performance benchmarks, monitoring communication between businesses and consumers, and promoting strong compliance and verification systems.

Pilot Program (2013 – 2016)

The EC is in the middle of a 3 year pilot program (2013-2016) to test the development of PEFCRs and OEFCRs. In addition to industrial categories, this pilot program includes 11 feed, food, and drink products: beer; coffee; dairy; feed for food producing animals; fish for human consumption; packed fresh meat from bovine, pigs, and sheep; uncooked pasta; packed water; pet food; olive oil; and wine. Together, this wave of 27 pilot programs include 302 leading stakeholders who represent companies, industry associations, NGOs, MS, Universities, or any other organizations. While there are no geographical requirements on what constitutes a stakeholder, the leader should have operations in the EU market. This wave of pilot programs is scheduled to conclude in December 2016 with the publication of final PEFCRs and OEFCRs.

Looking Ahead

According to the Commission, PEF is voluntary and should not act as a restriction to international trade. However, PEF could become a trade barrier for some producers if they are made mandatory because it will require the replacement of internal LCA processes with those that emerge from the EU pilot programs. Switching, adopting or concurrently applying an EU approach would be very expensive for many companies and could negatively affect their competitiveness on the EU market.

It should also be noted that the European Food Sustainable Consumption and Production (SCP) [ENVIFOOD Protocol](#) will be fully compliant with the PEF methodology. Although the [European Food SCP Round Table](#) is an industry-driven initiative, the Commission remains a co-chair of the meetings. USEU/FAS participates on the [European Food SCP Round Table](#) in Brussels and monitors the PEF pilot phase process closely as it may impact the competitiveness of U.S. companies if the PEF methodology becomes mandatory. After the pilots phase is completed in 2016, the Commission will evaluate whether the method, product and sector performance benchmarks and incentives were successful and will determine how they should be applied. Furthermore, the Commission will determine how these tools can be integrated in a wider range of already existing policy instruments to improve the environmental performance of products in the EU market. Based on the result of this assessment, the Commission will produce appropriate proposals as indicated in the Commission proposal for a new [EU Environmental Action Program to 2020](#).

Further Information

- For Questions & Answers (Q&A) related to the PEF Pilot Phase and Policy, please visit the [DG Environment Website](#)
- For more information on PEF, please visit the [World PEF Forum](#)
- European Commission [list of all PEF pilots](#)
- Commission [Recommendation on Carbon Footprint](#)
- [ENVIFOOD Protocol](#)