CIAA POSITION PAPER ON IPP

SUMMARY:

Given:

- **the specificity of the food products, ingested by the consumers, and the resulting heavy regulation already existing on food and drink products,**
- **the risk of interference between existing legal requirements and possible new requirements created by IPP, and the confusion resulting for the consumer,**
- **the numerous voluntarily steps the food and drink companies have been taking to continuously meet consumer needs in an environmentally sound and sustainable manner,**

CIAA considers that food products should be excluded from the scope of IPP.

The European food and drink industry is firmly committed to the continuous improvement of its product and process performance along the principles of sustainable development, including economic, environmental and social dimensions. Therefore we believe that the IPP strategy, as developed by DG Environment, is based on the wrong approach while considering environmental performance as the sole priority.

Moreover, the European food and drink industry is strongly of the opinion that the food products should be explicitly excluded from the scope of IPP due to their specificities.

The main reasons for this exclusion are:

- **A VERY STRICT AND COMPREHENSIVE LEGISLATION ALREADY EXISTS ON FOOD PRODUCTS:**
  The mission of the food and drink industry is to provide consumers with safe, high quality and wholesome foodstuffs. Food safety is the prime concern of industry and of the consumer while purchasing a food product (together with the taste, convenience, nutrition, freshness and price).
  In this context, **food and drink products are regulated by very detailed and comprehensive legislation starting at the farm gate and ending at the dinner plate**. This legislation covers food safety (contaminants, pesticide residues, quality of water intended for food consumption, etc.), food hygiene, food composition (additives, GMOs, flavourings), consumer information, nutrition, organic production, etc.
  Further environmental legislation on food products would interfere with existing food legislation and even hamper the correct application of this comprehensive and efficient legislation, e.g. regarding hygiene rules, minimum levels, labelling, traceability.

For example, the multiplication of environment-related information on food products could interfere with the rules on the labelling of food products.
Food industry simply can not accept this risk.

- **STANDARDIZATION DOES NOT FIT TO FOOD PRODUCTS:**
  In the food sector, standardization can only be applied to food processes and NOT to food products for obvious reasons. Wine is not standardized, cheese is not standardized, etc. Standardizing food products would not make sense as it would result in eliminating the diversity and variety of food products across the EU, hinder innovation and go against consumer preferences.

- **FOOD PRODUCTS ARE ALREADY EXCLUDED FROM EU ECO-LABEL:**
  Food products are exempted from the EU eco-labelling scheme (Council Regulation 880/92) since its origin, as a result of the food products' specificity. The only existing "green" labels are for organic food (EU Regulation 2092/91 on organic farming). Other "green" labels are likely to create confusion in consumer minds.

Besides, environmental considerations have already been integrated throughout the food supply chain. This includes:

- **Support for sustainable agriculture**
  It has been widely demonstrated that the farming phase accounts for most of the environmental impact in the food production cycle. Therefore, many efforts to positively influence the upstream part of the supply chain have been made for a long time. European food companies have recently reinforced their efforts through initiatives such as the Sustainable Agriculture Initiative (SAI) to actively support the development, recognition and implementation of sustainable practices for the production of agricultural raw materials. Similar initiatives also exist in other sectors such as fishery.

- **Eco-efficiency in production**
  Significant investments into eco-efficiency have also been made by the food industry. Food manufacturers have adopted more environmentally friendly practices and Best Available Techniques (BATs) to conserve natural resources and minimise waste generation. The adoption of eco-efficiency enables more efficient production processes while reducing the use of raw materials, water and energy and the generation of waste water, CO_2 emissions and solid waste for disposal along the entire food manufacturing chain.
  Besides, environmental management systems have been implemented in food and drink companies along EMAS Regulation and/or ISO 14001 standard, addressing both products and processes, including supply and delivery, and resulting in the continuous improvement of their environmental performance.

- **Efficient distribution**
  An optimal supply and distribution of foodstuffs to our consumers is essential. Food and drink manufacturers have improved their distribution efficiency, for instance with dual-temperature vehicles and new technologies. Although opportunities for progress still exist in this area, concerted efforts with retailers have been made to exploit opportunities for transport improvement in Europe.

- **Optimisation of product end-of-life**
  Food products are consumed. Therefore there is no final disposal of food products. What remains is the used packaging. Great progress has been achieved in this area which is heavily regulated. Food and drink companies always seek to improve the environmental performance of their packaging through the minimisation of the packaging weight and the use of materials that are ecologically and economically rational. In addition, a lot of efforts have been conducted to support the recovery and recycling of packaging waste. In doing so, food industry achieved the goal of absolute de-coupling between economic growth and final disposal of packaging waste.

- **The LCA approach proves to be insufficiently reliable.**
  The food and drink industry recognised LCA as an element in its early attempts to systematically identify environmental impacts along the agri-food chain. Many food and drink companies have been involved in LCA studies on different products such as margarine, dairy, bread, pork, natural mineral water or other beverages and also packaging. However, this LCA methodology has significant weaknesses (including choice of system boundary, data availability and accuracy, allocation procedures) which put its entire reliability into question. Therefore, LCA is definitely not designed to serve as an instrument for public policy-making and should remain an internal and voluntary tool for companies.