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Joint paper value chain reply on the EU Consultation on Green Claims

In December 2019, the European Commission presented its ambitious Green Deal roadmap, a comprehensive strategy aimed at putting Europe on the right track for climate neutrality in 2050 while encouraging sustainable economic growth. In this strategy, the role of consumers is clearly recognized: this transition won't happen without them.

The paper value chain associations recognize green washing is a threat to the involvement of consumers: they won't be able to make more sustainable choices if they don't receive reliable, comparable and verifiable information.

In the meantime, a proliferation of methods is observed which are used to measure and assess environmental impacts as well as a proliferation of labels and claims related to environmental information, which goes hand in hand with a proliferation of misleading environmental, including climate-related, claims.

For that reason, the European Commission has decided to leverage the Product Environmental Footprint (PEF) method to distinguish between valid green claims and green washing. The foundations of the PEF work were established in 2013, the idea was to develop a harmonized method to evaluate the environmental friendliness of products, focusing on their carbon footprint and related GHG emissions.

However, while we agree that green claims should be substantiated by a reliable and verifiable methodology and datasets, we still feel that there are areas that should be improved in the PEF methodology.

These include:

- Further development of the land use impact methodology that reflects sustainable forest management realistically and the circularity formula.
- We would also welcome developing rules on how intermediate product footprint results will be linked to the final product calculations.
- PEF data are currently not up-to-date for several product categories. In the case of paper intermediate products we would welcome a collaboration to ensure the PEF data are updated and reliable. This should also include the secondary data for each product category. This data update should precede any consideration of legislative action.
- In relation to packaging, a holistic approach should be taken, which includes both the product and the packaging. This will help consumers make accurate choices and prevent unintended consequences especially around food waste.



- We support a harmonised approach, which uses the Single Market as the legal basis. We also believe a voluntary approach should be adopted for a green claims legal framework in coherence with international standards, as this will facilitate the dynamic improvement in PEF databases and methodology; which will itself support continued innovation.
- The framework should apply to all products whether produced in the EU or imported so as to ensure a level-playing field.

It is to be welcomed that consumers are seen as enabling stakeholders in the Circular Economy Action Plan 2.0. Consumers do however obtain their information from many sources, not just information from producers. Green claims should therefore extend to information provided by the media or other stakeholders. This will help prevent imperfect information and market failure.

We are committed to work further with the EU institutions on the development of the PEF and OEF (Organisation Environmental Footprint) methodologies complementing international standards, and will continue to work to provide up to date datasets that can be used by the value chain.