

Substantiating Green Claims

Streamline green claims, but allow for customised solutions

Fibre Packaging Europe welcomes the Commission's upcoming regulation on substantiating green claims as an important tool towards a climate neutral, resource efficient and circular economy.

Today, there is a proliferation of methods to measure the environmental performance of products, and of labels to communicate their performance to consumers. While labels were initially conceived to simplify communication, their proliferation and misuse have actually increased confusion among consumers and decreased their trust.

If appropriately designed, legislation on substantiating green claims could ensure that whenever such statements are made, they are trustworthy and backed by scientific evidence. Such an initiative would be a step in the right direction provided the accounting of product-related externalities and their environmental impact are based on reliable and verifiable methods and robust data.

The legislative proposal on substantiating green claims should recognise and enhance the performance of frontrunners, and acknowledge the crucial role they play in reducing emissions. Fibre-based packaging actively contributes to the green transition by providing a viable and sustainable alternative to fossil-based packaging solutions.

Fibre Packaging Europe suggests including the following considerations in the upcoming legislative proposal on substantiating green claims:

1. **Secure a level playing field between EU produced and imported products**
2. **Adopt a voluntary framework based on existing recognised or standardised methods to create a win-win situation**
3. **Improve the Product Environmental Footprint (PEF) method before mainstreaming it**
4. **Use existing national structures to verify green claims**

1. **Secure a level playing field between EU produced and imported products**

In an open and market-based economy, European produced fibre-based packaging competes with products imported from other parts of the world. To be effective in driving real change and to secure a level playing field, it is therefore important that requirements to substantiate green claims for EU products also apply to imported products.

2. **Adopt a voluntary framework based on existing recognised or standardised methods to create a win-win situation**

We strongly believe that the European Commission should establish a voluntary policy framework where consumers can rely on green claims based on existing methods that are standardised, widely recognised, and tailored to fit different products and materials. These existing methods include for example the EU Ecolabel, Environmental Product Declarations (EPD) and ISO standards. The use of the Product Environmental Footprint (PEF) method could be recommended for product categories that have a pilot case and could apply the methodology as is.

Policymakers can create a win-win situation by leveraging methods that are already used by companies, research institutes and others, increasing consumer trust in the credibility of green claims while at the same time allowing companies to rely on existing, verified methods. Such an approach would ensure faster compliance and lower costs.

3. Improve the Product Environmental Footprint method before mainstreaming it

The European Commission launched the Product Environmental Footprint (PEF)¹ as a common way of measuring environmental performance of products based on the assessment of their life cycle. In July 2020, a PEF SME tool was launched by the Confederation of European Paper Industries (Cepi) to ensure that even small and medium-sized enterprises can independently carry out a PEF compliant analysis. The PEF SME tool is fully based on the Intermediate Paper Product PEF Category Rules (PEFCRs), which are the most comprehensive of existing PEF Category Rules, as they cover all 16 environmental impacts included in the EU methodology. Intermediate paper products are used, for instance, in the manufacturing of fibre-based packaging.

Despite the fact that PEF developments provided a basis for CEPI's SME tool, several areas of the PEF methodology still require improvement before its use can be mainstreamed:

- Further development of the land use impact methodology is needed to correctly reflect sustainable forest management. For example, while national laws require forest owners to replant after harvesting, the tool equates forest management to other land use, such as mining, which creates permanent land use change.
- The PEF methodology was developed to overcome the proliferation of existing methods and to allow for the objective evaluation of the environmental performance of products and services. While the methodology is available, PEFCRs currently cover only a limited number of specific products and value chains, excluding a large proportion of products on the market. The existing PEFCRs for intermediate paper do not cover the conversion steps from paper to packaging. This means that it cannot be used to evaluate the impact of the final packaging product.
- The process for how and when data are updated or added to the PEF data nodes and PEFCRs is clearly described, but the available data is far from complete. Data for several product categories need to be updated and industry should be more closely involved to contribute to these updates.

4. Use existing national structures to verify green claims

Within the voluntary framework, which should be based on a simplified verification system, existing national authorities with relevant competence could verify green claims.

The right to communicate green claims as well as the underlying life cycle assessment data should lay solely with the producer of the product or material in question, not with any structure that may have played a role in its verification or certification.

Fibre Packaging Europe looks forward to working with policymakers to ensure that stakeholder concerns and scientific evidence are taken into consideration before the legislative proposal is released. We remain available to provide additional information, expertise and data, and would appreciate the opportunity to continue the dialogue with policymakers on this crucial topic.

About Fibre Packaging Europe

Fibre Packaging Europe is an informal coalition of eight trade associations representing industries involved in forestry, pulp, paper, board and carton production and recycling from across Europe. Our joint mission is to provide renewable, circular and sustainable fibre-based packaging solutions to European citizens to achieve the European Green Deal objectives. Together, we represent around 1500 companies and over 2200 manufacturing plants, we employ more than 365.000 people across Europe and our annual turnover is around EUR 120 billion. For more information, please contact papercoalition@apcworldwide.com.

¹ [European Commission: Single Market for Green Products - Product Environmental Footprint policy background](#)