

## Public Consultation on Rules for Environmental Footprint of Products in the EU

At the end of July 2016, the European Commission launched public consultations on Product Environmental Footprint Category Rules (PEFCR) for feed, food and drink products.

The development of rules and methods to measure and communicate the environmental performance of products was initiated by the European Commission in 2013 as part of its Communication entitled *Building the Single Market for Green Products* (see also the Greenhouse 2013 detailed report on sustainability issues in the EU).

The PEFCR initiative kicked off a three-year pilot phase for the development of (eleven) product-specific rules through a multi-stakeholder process. More information on the initiative can be found here: [http://ec.europa.eu/environment/eussd/smgp/ef\\_pilots.htm](http://ec.europa.eu/environment/eussd/smgp/ef_pilots.htm) and here at the website of FAS (U.S. Mission to the EU in Brussels) <http://www.usda-eu.org/topics/footprinting/>.

For each product group a Technical Secretariat was formed, consisting of representatives from trade associations and companies in the supply chain and experts from Blonk Consultants (contracted by the European Commission). The Secretariats organized three-year pilots for each product group and compiled the results in the draft PEFCRs which are now subject to public consultation. There are PEFCRs for, among others, animal feed (deadline: September 9, 2016), packed meat (deadline: September 16, 2016), dry pasta (deadline: August 30, 2016), wine (deadline: September 9, 2016) and dairy (deadline: September 9, 2016).

When the Commission launched the PEFCR initiative in 2013 it expressed a preference for the voluntary use of harmonized methods to provide the market with reliable and comparable information about the environmental impacts and credentials of products.

At this point, it is difficult to predict how widespread the use of the initiative will be, but many associations and companies were involved in the development of the draft PEFCRs. One possible explanation is that the private sector strongly prefers a voluntary approach for a complex initiative. As such, industry has devoted resources to the initiative with a view to heading off any potential European Commission action that would involve mandatory legislation. Such legislation would have the potential to impact U.S. exports. For example, the scope of the draft PEFCR for feed extends to the cultivation and production of raw materials.

In addition, the European Food Sustainable Consumption and Production (SCP) [ENVIFOOD Protocol](#) will be fully compliant with the PEFCR methodology. The objective of this initiative, which was launched in 2010, is to promote a science-based, coherent approach to sustainable consumption and production in the food sector across Europe, while taking into account environmental interactions at all stages of the food chain. Although the [European Food SCP Round Table](#) is an industry-driven initiative, the Commission remains a co-chair of the meetings.

Interested parties wishing to submit comments can find instructions in the following link: [http://ec.europa.eu/environment/eussd/smgp/pdf/Wiki\\_reginstr.pdf](http://ec.europa.eu/environment/eussd/smgp/pdf/Wiki_reginstr.pdf).

It is expected that the PEFCRs will be finalized in the first quarter of 2017.