

Position paper

17.03.2022

Product Environmental Footprint (PEF)

The AöL generally welcomes the efforts to make environmental performance visible in the context of foods as well. The concept of the Product Environmental Footprint (PEF) as a basis for „sustainable food systems“ is rejected for the following reasons.

1. The current design of the PEF is not suitable as a basis for mapping a „sustainable food system“. The efficiency-oriented PEF system is in contradiction to a comprehensive sustainability assessment that takes into account circularity and sufficiency.
2. The databases on which the PEF is based, such as Agribalyse, does not offer a sufficiently differentiated database to represent environmental performance appropriately. For example, there is a lack of basic data from the area of organic production across the entire food chain.
3. The implementation of sustainability labelling based on PEF will significantly handicap the politically desired expansion of organic agriculture and food.
4. The introduction of state-assured, contradictory, competing sustainability claims on food will disorientate citizens.

Conclusion

In view of the first results from the premature application of systems that are not sufficiently precise, the AöL sees a risk for a transformation of the food system that is anchored in the European “Green Deal” strategy. This is particularly relevant to the achievement of the German target of 30% organic farming. Through this and the introduction of new alternative product labels, the European organic initiative will be severely waked and resources that could lead to an improvement of “organic” will be blocked.

A further development of the organic regulation through the implementation of sustainability factors along the chain is expedient and meets the expectations of consumers that already exist today. Contradictory, competing sustainability statements at product

level will thus become obsolete, a stringent policy will be ensured and sustainable consumer communication will be made possible.

Background

On 1:

Compare the [AöL commentary on environmental labelling, in particular PEF/OEF](#).

On 2:

Databases such as Agribalyse, on which the PEF is based, do not offer a sufficiently differentiated database to adequately represent environmental performance. There is a lack of basic data from the area of organic production across the entire chain. In the conventional sector, too, the positive assessment of nuclear power, for example, can lead to massive disadvantages with regard to German production. The German targets of 30% and the European target of 25% organic cannot be met if organic products score low in the PEF.

On 3:

Within the framework of a project funded by the BÖLN, the AöL has tested the PEF system and benchmarks at three typical larger medium-sized organic companies in Germany. The final report for this project is not yet available, but it can already be said that all three organic companies do not reach the benchmarks in some cases. In the calculation of the Product Environmental Footprint (PEF), animal welfare, biodiversity and circular economy, for example, play only a limited role or no role at all. But environmental services are complex statements that can only be represented in labels inadequately and with a focus on a few key statements. The PEF system is based on efficiency and therefore means that the larger company, the better it performs. We also see considerable problems in the communication of the PEF

On 4:

Improve organic instead of building alternative systems. In consumer communication today, the term "organic" plays a central role as a synonym for environmentally sustainable products. The term enjoys a high level of trust among the citizens. Politically, 25% organic food is targeted in the EU in 2030. A further development of the organic regulation through the implementation of sustainability factors throughout the chain therefore appears to be a goal-oriented approach and does justice to the already existing demands of consumers. This approach makes a new sustainability labelling for food unnecessary and creates clarity for people and strengthens the political objectives.

Association of Organic Food Processors e.V.

The Association of Organic Food Processors e.V. (AöL) represents the interests of the food processing industry in German-speaking Europe. The AöL's tasks include the political representation of interests and the promotion of exchange and cooperation among its members. The more than 120 AöL companies, ranging from small and medium-sized enterprises to internationally active companies, generate a turnover of more than 4 billion euros with organic food. The AöL is a discussion partner for politics, business, science and the media in all matters of organic food processing.