

## **UNESDA submission to the consultation on the inception impact assessment on empowering the consumer for the green transition**

### **Overview of UNESDA**

UNESDA - Soft Drinks Europe is the Brussels-based trade association representing the non-alcoholic beverages sector, representing European producers of soft drinks including carbonates, still drinks (e.g. ice teas), energy drinks and fruit-based drinks.

The membership of UNESDA comprises 24 national beverages associations and 9 companies with operations in several member states.

The EU soft drinks sector is rooted in the European economy and society throughout its €185 billion value chain - employing 1.7 million people throughout its value chain, and with 424 soft drinks production and bottling plants.

**UNESDA fully supports the input to this consultation provided by its umbrella association FoodDrinkEurope. In this present submission, UNESDA places emphasis on some of the key aspects of major importance and relevance to the EU soft drinks sector.**

### **Taking consumer empowerment to the next level**

The European soft drinks industry is a firm supporter of the green transition as outlined in the European Green Deal and of the Circular Economy Action Plan, referencing green claims as a key objectives to ensure circularity. Our members have been driving sustainability throughout their value chains for more than 30 years – from reducing and reusing water, energy and raw materials in their production through to setting-up and running packaging waste collection and recycling systems across Europe. But they have also been working to provide consumers with the right information to make sustainable choices, by encouraging them via labels to recycle beverage packaging, by providing information around the recycled content used in each packaging, by informing them of efforts made to reduce the CO2 footprint of their favourite beverages.

We fully support the Commission’s approach that consumers must be at the heart of the green transition and that providing them with appropriate tools to contribute to this transition will be crucial, building a partnership between producers and consumers.

Empowering consumers means having a holistic approach to the green transition: it should be based on a realistic and workable transition period, it should consider labelling in link with packaging and nutrition labelling legislation as well as providing a clear direction to private actors to make long-term investments into circularity and sustainability.

### **Leveraging the experience gained from labelling discussions at EU level**

To enable consumers to be able to make informed choices when purchasing a soft drink, UNESDA was the first sector in the world to roll out clear ‘at a glance’ on-pack labelling in 2008. This scheme was initially known as ‘GDA’ (‘Guideline Daily Amount’) labelling, latterly known as ‘RI’ (‘Reference Intake’) labelling.

Our industry has been at the forefront of strengthening labelling information at EU level. Lessons can be learned from health and nutrition discussions and be applied in the case of green claims and environmental labelling. A number of principles should be followed at EU level to ensure fair and efficient rules are in place:

- First and foremost, a labelling scheme around environmental information must serve consumers – meaning helping them to make informed choices, incentivize producers to transition to more sustainable packaging and practices, and ensure a responsible and wide consumer choice
- Such an approach should be based on scientifically grounded, comprehensive standardized environmental footprinting methodology. It requires the adoption of clear rules for product environmental footprint to be applied across the board of all food and drink products. It needs to be based on a number of different indicators, avoiding to only focus on carbon footprint but putting all relevant environment elements in the balance (including food waste, sustainability of crops used, shelf life...)
- EU institutions should promote a harmonised approach on the matter at EU level: without an EU approach, we face the risk of seeing a proliferation of different labelling schemes across Europe from a variety of sources, such as retailers, national authorities and food producers, leading directly to further fragmenting of the EU market and confusion for the EU consumers

It is also important to consider digital solutions to labelling, by enabling and incentivising the use by consumers and producers of apps, scans, and QR codes to have information about products and how they were made.

We also consider that it is crucial to also bear in mind the international dimension of green claims: the EU should ambition for its future rules to become a standard for global supply chain and ensure consistency in the methodologies across the globe.

### **Using Product Environmental Footprint ('PEF') and Life-Cycle Assessment ('LCA') as the foundations for an EU policy framework on environmental information**

In the Circular Economy Action Plan published in 2020, it is indicated that *“the Commission will also propose that companies substantiate their environmental claims using Product and Organisation Environmental Footprint methods. The Commission will test the integration of these methods in the EU Ecolabel and include more systematically durability, recyclability and recycled content in the EU Ecolabel criteria”*.

We consider it crucial for the Commission to first clarify how those methods should be implemented. The PEF, and its foundation in LCAs should indeed be considered as the starting point to establish a harmonised policy framework on how to make standardised environmental information available. For instance, a number of food and drink categories do not have PEF category rules: the Commission needs to therefore clarify how those categories, e.g. soft drinks, will be integrated in PEF. We call on the European Commission to create the appropriate working groups and workstreams to enable all relevant stakeholders – private sector, academia, civil society... – to contribute to building this framework.

### **Ensuring consistency between packaging and green transition legislations**

Lastly, UNESDA considers that the legislative proposal around empowering consumers in the green transition should be closely linked to other EU legislative reviews, in particular the review of the Packaging and Packaging Waste Directive. The latter aims to reduce packaging waste generation and limit overpackaging. We believe it is crucial for both legislations to be consistent: for example, as the waste legislation plans for use of more plastic recycled content, the green claims legislation should ensure it can be communicated effectively to consumers. Incentivising more sustainable practices must come with long-term perspectives and legal certainty for economic operators: transitioning to

more sustainable packaging, production processes reducing the carbon footprint of products, recycling innovations, infrastructures, require long-term planning and investments.

The green claim proposal should also take into consideration other crucial elements in food and drink production, including reducing food waste and increasing the shelf lives of food and drink products, as well as food safety and supply chain constraints.

It is essential that a proposal empowering consumers in the green transition also continue upholding the principles of circular economy, meaning that a packaging that is easily recyclable, collected and recycled, must be considered as a full and legitimate part of that circular thinking – and presented to consumers as such to help them make informed and sustainable choices.

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