



Agroecology Europe's feedback to the European Commission's proposal on Green Claims

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Agroecology Europe (AEEU)—the European association promoting agroecology as a set of practices, a science, and a movement across Europe—welcomes the opportunity to give feedback on the Commission's legislative proposal on green claims.

AEEU welcomes the spirit of the legislative proposal and the approach of setting up transparent criteria for environmental claims. The multiplication of sustainability labels¹ is not per se a barrier to sustainable choices for consumers. Nevertheless, to ensure that agroecology is scaled up in Europe, we need an EU law on EU Sustainable Food Systems and to reform the Common Agricultural Policy.

AEEU calls on the co-legislators to reinforce the legislative proposal on the following points to stop the proliferation of greenwashing of food and agricultural products.

1. Set clear timelines for developing indicators accounting for biodiversity loss

AEEU insists that the wording of recital (32) in the legislative proposal needs to be strengthened to make sure that Product Environmental Footprint Category Rules (PEFCRs) integrate externalities from food and agricultural production. These externalities include biodiversity and nature protection and also the positive externalities of productive low-input-use farming, carbon sequestration in arable soils, and grassland-based livestock production that guarantees animal welfare. Measuring environmental performance must include these factors.

¹ It is important to make a difference between 'label' and 'trade mark'. In the EU, a quality label belongs to public authorities, such as the organic label, PDO, etc. It is based on well-defined specifications. The respect of these rules are controlled and certified by an independent body. In contrast, a trade mark belongs usually to a private company. It can pertain to a higher quality than usual products. Specifications may exist but are usually not certified by an independent body.

The High Level Panel of Experts on Food Security and Nutrition of the FAO on agroecological and other innovative approaches² recommends adding ecological footprint as an operational principle for sustainable food systems to adequately capture how consumption patterns affect production and how ecologically degenerative or regenerative the practices are (HLPE 2019, p. 16). Moreover, comprehensive performance metrics, covering all the impacts of agriculture and food systems are key requirements for rational decision-making for food and farming policy (Ibid, p. 19).

2. Consider OASIS as an operational indicator supporting the agroecological transition proscribed in the EU Green Deal

The legislative proposal explains lessons learnt from trying to find a standard methodology to substantiate claims on environmental impacts (p. 12). Existing methods still do not cover all relevant categories, as for instance food and agricultural products, farm level biodiversity, and nature protection, *'and may therefore give an incomplete picture of the environmental credentials of a product in the green claims context'*.

AEEU considers the proposed Life Cycle Assessment (LCA) methodology as insufficiently holistic to measure green claims. The study from van der Werf et al.,³ which serves as the basis for the Green Claims in this legislative proposal, explains that using LCA to assess agroecological systems is inadequate for three reasons: (1) a lack of operational indicators for key environmental issues; (2) a narrow perspective on functions of agricultural systems, and (3) inconsistent modeling of indirect effects.

LCA only analyzes the efficiency and quantity of the resource, not its quality. From a holistic and systemic perspective, it is incomplete as it leaves out potential impacts and externalities. LCA fails to consider whether the system regenerates resources—e.g., soil, groundwater, biodiversity, etc.—and only analyses systemic functions as isolated processes. Therefore, LCA cannot measure positive externalities of farming practices and thus the transition towards agroecology. The use of inadequate methodology to implement key sustainability legislation hinders the agroecological transition proscribed in the Green Deal.

In order to measure the agroecological progress of farmers, it is crucial to give space to more hands-on indicators in the legislative proposal, meeting farmers in the field. The OASIS agroecological indicator system⁴ developed by Agroecology Europe is such an indicator that provides a comprehensive framework to assess the sustainability in farming and food systems and transition progress toward agroecology.

² HLPE. 2019. Agroecological and other innovative approaches for sustainable agriculture and food systems that enhance food security and nutrition. A report by the High Level Panel of Experts on Food Security and Nutrition of the Committee on World Food Security, Rome. <https://www.fao.org/3/ca5602en/ca5602en.pdf>

³ van der Werf, H.M.G., Knudsen, M.T. & Cederberg, C. Towards better representation of organic agriculture in life cycle assessment. *Nat Sustain* 3, 419–425 (2020). <https://doi.org/10.1038/s41893-020-0489-6>.

⁴ Peeters, A., Škorjanc, K., Wezel, A., Migliorini, P. 2021. OASIS, the Original Agroecological Survey Indicator System. A simple and comprehensive system for agroecological transition assessment. Agroecology Europe, Brussels. <https://www.agroecology-europe.org/oasis-brochure/>.

3. Support Participatory Guarantee Systems as an additional label to ensure inclusion, participation, and transparency for consumers

To make sure no one is left behind, the legislative proposal needs to give full recognition to Participatory Guarantee Systems (PGSs). PGSs are organizational schemes within a cooperative composed of producers and consumers in which the product is not controlled by a third party attributing quality seals. This system is to date mainly used in the global south and is locally anchored and adapted. This form of cooperation between members of the cooperative, producers and consumers, is based on mutual trust, consensus, transparency, and horizontal decision-making. PGSs include diverse stakeholders in defining their own sustainability standards while also taking into account global standards. The European Parliament and the Council need to adopt citizen's science models and participatory research⁵ to empower communities as part of the legislative negotiations, in order to gain citizens' trust, build a common understanding of sustainability, and engage with social groups currently excluded from research and science.

⁵ See, for example the You Count Youth Citizen Science project: <https://www.youcountproject.eu/>