

European beverage carton industry response to the public consultation on the draft proposal on the Green Claims directive

The Alliance for Beverage Cartons and the Environment (ACE) and its members Billerud, Elopak, SIG Combibloc, Stora Enso and Tetra Pak acknowledge and support the European Commission's efforts to promote sustainability and combat greenwashing through the proposed Green Claims Directive. The beverage carton industry has a long experience on diverse ESG topics such as life cycle studies following international standards and ACE believes that a clear and transparent regulation is essential to foster trust and enable consumers to make informed choices.

Considering the possible implications of the proposed directive, ACE would like to recommend the following:

- Recognise the key role of existing international harmonized standards.
- Ensure that the Directive encourages sustainable material choices.
- Create legal certainty for the industry by clarifying the scope and terminology in the proposal.

Recognise the key role of existing international harmonized standards

ACE believes that the European Commission should acknowledge the central role of existing international standards to substantiate Green Claims, such as, the ISO 14021, ISO 14040 and others.

ISO 14021 is a widely recognized standard which provides guidelines on self-declared environmental claims. It includes statements, symbols and graphics, regarding products and describes terms commonly used in environmental claims, giving qualifications for their use.

ISO 14040 is a widely recognized international standard that provides guidelines for conducting life cycle assessments (LCAs) of products and services. The standard offers a systematic framework to assess the environmental impacts associated with a product or service throughout its entire life cycle to obtain a comprehensive understanding of a product's environmental footprint. To ensure the reliability of such studies, ISO compliant assessments should be approved by three external reviewers.

The beverage carton industry has a long experience of performing LCAs following the ISO 14040 standard and provides consistent, transparent and robust information regarding the environmental performance of beverage cartons. Studies performed according to ISO 14040 standards already follow strict requirements, therefore, creating additional requirements will create complexity and unnecessary burden to companies. The proposal requires a verification of conformity with the Green Claims; however ISO compliant studies already go through three external reviewers.

Encourage sustainable material choices

The beverage carton industry is committed to promoting sustainable material choices for the food value chain to reduce the environmental impact of products for consumers. By raising consumer awareness, the EU Green Claims Directive can be a positive force against greenwashing. ACE believes the Directive should have a key role of providing reliable information for consumers to make sustainable material choices. The Directive should therefore allow the comparison of the environmental performance of products serving a similar function as well as of new products with old ones allowing



companies to demonstrate the improvements in product development, to ensure companies are encouraged to invest in sustainability attributes and are allowed and to present such improvements within their marketing efforts.

Clarify scope and terminologies in the proposal

The following definitions require further clarification:

Scope – art. 1 (1): Trader and business-to-consumer commercial practices definitions referred in the proposal does not provide enough clarity as whether this would encompass trade associations or claims made by companies that does not produce an end product and do not target consumers directly (e.g., claims published on a website from a B2B company).

Common practice - art. 3.1. (f): The proposal sets a requirement that claims should perform significantly better than the “common practice” in a product group. The text states that “common practice” could be equivalent to minimum legal requirements except when the sector performs better than the legal requirements, in this case, they should not be considered. This definition is challenging for environmental performance claims, since there are no legal requirements, leaving this definition to traders will create inconsistencies across environmental claims.

ABOUT ACE

The Alliance for Beverage Cartons and the Environment (ACE) is the beverage carton industry’s European platform with a mission to protect essential food and beverages. We work hand-in-hand with diverse partners across Europe to progress EU Green Deal Ambitions and provide expert insights on the essential protection and low carbon benefits of beverage cartons to regulatory officials and other EU stakeholders. Circularity, resource efficiency and innovation are at the heart of our industry which provides a safe, secure and sustainable packaging solution that consumers rely on daily.

ACE members comprise of three European beverage carton producers Elopak, SIG Combibloc and Tetra Pak and their two paperboard suppliers Billerud and Stora Enso. Together they employ roughly 24,000 people across Europe, using 95% renewable energy, to produce an estimated 44 billion beverage cartons annually which are recycled throughout ~20 facilities.

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