

Brief description of the legal opinion

on the proposal for a directive of the European Parliament and of the Council on the substantiation and communication of environmental claims (Green Claims Directive)

and

on the proposal for a directive of the European Parliament and of the Council amending Directives 2005/28/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information

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1. Research project

The aim of the research project „Überprüfung der Ressourceneffizienz von Ökolebensmitteln anhand des Product Environmental Footprint (PEF) und Einordnung in eine Nachhaltigkeitsstrategie“ (Öko-PEF) (Engl: Review of the resource efficiency of organic food using the Product Environmental Footprint (PEF) and integration into a sustainability strategy") was to validate the optimisation potential for increasing resource efficiency in organic food processing by comparing the current situation with the benchmarks defined in the Product Environmental Footprint (PEF). To this end, the PEF was calculated on a test basis for three organic product categories (organic milk, pasta and meat). The results show that the environmental performance of organic food cannot be adequately calculated due to a lack of available data (primary and secondary). Potential for optimisation was identified, particularly in terms of data availability. Furthermore, based on a holistic sustainability analysis, it was found that, in addition to the lack of relevant indicators such as animal welfare or biodiversity, which are highly valued by consumers, key sustainability dimensions (social and economic) and sustainability strategies such as consistency and sufficiency are not covered by the PEF. However, it is precisely the latter two sustainability strategies that are crucial for a socio-ecological transformation.

Based on the results of the research project on the application of the PEF and the resulting concerns about its application in the assessment of agricultural products, the relationship between the PEF and the ongoing legislative processes in Brussels is of great interest to the industry. The publication of the proposal for a directive on the substantiation and communication of environmental claims (Green Claims Directive) on 22 March 2023 has caused great uncertainty, particularly in the organic food industry, regarding the environmental communication of food products, although foodstuffs are exempted from this under Regulation (EU) 2018/848. In order to alleviate this uncertainty and to address the existing questions regarding the future requirements for the environmental communication of organic food, a comprehensive legal opinion was commissioned from the law firm WBS legal as part of the research project. The summary presented here summarises the key findings and results of the detailed report.

2. Introduction and background

The European Commission has committed itself to the fight against greenwashing. In order to eliminate the lack of explicit regulations on environmental and green claims and to create legal clarity and certainty throughout the EU with regard to the communication of environmental claims, it published two proposals for directives in March 2022 and 2023.¹

In March 2022, a proposal for a directive (COM (2022) 143 final) was published to amend Directive 2005/29/EC also known as the Unfair Commercial Practices Directive (and hereinafter referred to as the **UCP Directive**) and Directive 2011/83/EU the Consumer Rights Directive. This proposed directive is referred to below as the **Amending Directive**.² One of the aims of this directive is to help consumers make greener choices by stopping the use of misleading environmental claims and non-transparent environmental and sustainability labels (so-called greenwashing).

Almost a year later, on 22 March 2023, the Commission presented a draft directive (COM (2023) 166 final) on the substantiation and communication of environmental claims (hereinafter referred to as **the Green Claims Directive**). This proposal for a directive goes much further than, and overlaps with, the proposal for the Amending Directive published a year earlier.³ The purpose of this directive is to authorise only those environmental claims and sustainability labels whose environmental impact is reliable, comparable and verifiable. The aim is to create harmonised standards in the EU for information requirements and the verifiability of environmental claims on products.

The Green Claims Directive therefore builds on the Amending Directive. The Green Claims Directive is intended to supplement the Amending Directive (lex generalis) as a more specialised law (lex specialis) and take precedence over it by specifying certain aspects and requirements for explicit environmental claims in terms of justification, communication and verification.

¹ GRUR-Prax 2023, 289, beck-online.

² <https://eur-lex.europa.eu/legal-content/DE/TXT/?uri=CELEX%3A52022PC0143>

³ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=COM%3A2023%3A0166%3AFIN>

3. Investigation mandate of the legal opinion

The aim of organic food production is a resource-saving and environmentally friendly form of land use and food processing. To be allowed to carry the European organic label or private organic labels based on it, producers of organic food must at least comply with the strict production rules laid down in Regulation (EU) 2018/848.

The benefits of organic food for the environment and society have been scientifically verified many times (environmental and resource protection, water conservation, soil fertility, biodiversity, climate adaptation and resource efficiency)⁴⁵. For this reason, organic food production is receiving special political support as part of the Green Deal and the Farm to Fork strategy, as well as the German government's national food strategy, which is currently being developed. In summary, producers, processors and retailers of organic food also communicate the environmental performance of their products by displaying EU, national and private organic labels.

The aim of this legal opinion, which was prepared as part of the Öko-PEF project, was to examine the consequences of the proposed Amending Directive and the current proposal of the Green Claims Directive for environmental and sustainability communication in relation to organic food.

As both the proposed Amending Directive and the Green Claims Directive are intended to ensure standardised EU-wide rules for all types of products, it was also necessary to examine whether the two proposed directives are applicable to organic food and where there are still gaps in the regulations or a need for amendments, in order to submit possible amendment proposals to the European Parliament before the draft directives are adopted.

4. Relationship of the Amending Directive to the current EU Organic Regulation and its impact on environmental communication about organic food

The **Amending Directive** essentially regulates the prevention of greenwashing and the prohibition of the use of unreliable and non-transparent sustainability labels and sustainability information tools. In addition, the proposal also regulates the so-called practices of early obsolescence, although these had to be relegated to the background in the context of the legal opinion. Both the prevention of greenwashing and the ban on the use of

⁴ Sanders J, Heß J (eds) (2019) Leistungen des ökologischen Landbaus für Umwelt und Gesellschaft. 2nd revised and supplemented edition. Braunschweig: Johann Heinrich von Thünen Institute, 398 p, Thünen Rep 65, DOI:10.3220/REP1576488624000

⁵ Hülsbergen et. al (2023): Environmental and climate impacts of organic farming

unreliable and non-transparent sustainability information also have a direct impact on food labelling.

Definition of environmental claims

In addition to the proposed new legal definitions of environmental claims (such as "environmental claim" or "generic environmental claim"), certification schemes or even sustainability labels, the UCP Directive is to be supplemented by prohibitions of environmental claims in accordance with the Amending Directive. However, the requirements of the Amending Directive relate less to the production of food than to its marketing. In particular, the presentation of sustainability labels or other sustainability claims will be more strictly regulated. This is also important for food business operators, for example when it comes to the presentation of animal husbandry methods or the labelling of foods with various sustainability claims, such as "climate friendly". In the future, such environmental claims should only be possible if they either actually refer to the entire product or if it is made clear to which part of the product the environmental claim relates. For example, it would have to be clearly stated why the food, the packaging or the product as a whole is "climate friendly".

Prohibition of advertising environmental performance based on legal requirements

The Amending Directive then prohibits the emphasising of legally required product characteristics. Labelling must not give the impression that the characteristic is a unique selling point when in fact it is based solely on legal requirements. For example, advertising a food product in Germany with the use of ingredients authorised exclusively in the EU would then be inadmissible advertising. However, an organic product must still be allowed to be labelled as such, even if its production is based on legal requirements. So it depends on the type of labelling.

Mandatory labelling of organic food

Advertisements claiming "outstanding environmental performance" (a definition in the Amending Directive) must always refer to the claim made. If a product meets the requirements of the EU organic label, it must be labelled with it. This means that the organic label must be used on all pre-packaged food produced and sold as organic in the EU. In addition, the national organic label of the Federal Ministry of Food and Agriculture, as a national logo, which is awarded in accordance with the requirements of Regulation (EU) 2018/848, can probably continue to be used as a national logo and is also compliant with the Amending Directive.

However, if there is an obligation to label organic food, this no longer constitutes an environmental claim within the meaning of the Amending Directive, which only refers to voluntary environmental claims (Art. 1 No. 1 (o)). If organic food is produced in compliance with all organic environmental and animal welfare regulations and is obliged to bear the EU organic label, then terms such as "environmentally

friendly" and "gentle on the environment" should be able to be used. However, this presupposes that the claims are verifiable and comprehensible. The claims - recognisable to consumers - must refer only to the part of the product that actually delivers the advertised outstanding environmental performance.

Verifiability of the data

The most important requirements are that the assessment must be based on internationally recognised scientific findings and must therefore be verifiable. Conversely, this means that the assessment and justification of the environmental performance must be regularly updated if new scientific findings emerge.

Generic environmental claims

Generic environmental claims where the trader cannot demonstrate the recognised outstanding environmental performance to which the claim relates (see Annex I No. 2 of the Amending Directive) are to be prohibited in future. This is primarily intended to prohibit claims whose content cannot be clearly determined and proven, such as "environmentally friendly". This is particularly important in terms of transparency towards consumers, who should be able to trust the content of a claim. According to the proposal of the Amending Directive, environmental claims should only be explicitly allowed if the conditions for "excellent environmental performance" according to Article 1 No. 1 lit. u) of the Amending Directive are met and can actually be proven.

Outstanding environmental performance of organic food

Organic foods labelled with the EU organic logo can be considered as products with an excellent environmental performance on the basis of recital (10) (*"Recognised environmental excellence can be demonstrated by compliance with Regulation (EC) No 66/2010, or with officially recognised EN ISO 14024 eco-labelling schemes in the Member States, or with top environmental performance for a specific environmental characteristic in accordance with other applicable Union laws, such as a class A in accordance with Regulation (EU) 2017/1369 of the European Parliament and of the Council"*). Organically produced food that fulfils the requirements of the EU organic label is therefore also to be regarded as a product with outstanding environmental performance within the meaning of the Amending Directive. So at this point there is an interaction between the Amending Directive and the current EU Organic Regulation.

5. Relationship between the Green Claims Directive and the current EU Organic Regulation and its impact on the environmental communication of organic food

Exclusion of organic food

The **Green Claims Directive** is not intended to be a self-contained set of rules, but to function as a supplement in parallel - also to the UGP Directive. Of relevance for producers of organic food is the exclusion of application under Art. 1 Para. 2 b) of the Green Claims Directive to products covered by the EU Organic Regulation. In concrete terms, this means that for food produced in accordance with the provisions of the EU Organic Regulation, labelling in accordance with the EU Organic Regulation takes precedence. However, the labelling of food in accordance with the EU Organic Regulation "only" relates to the aspect of production or processing and not, for example, to the method of production of the packaging material. Any environmental claims concerning the food that go beyond this and are not covered by the EU Organic Regulation (e.g. environmental claims relating to the packaging) must be assessed in accordance with the requirements of the Green Claims and UGP Directives.

Environmental labels

In future, according to Art. 2 No. 1, 2 of the Green Claims Directive, environmental labels which claim that a product has a positive or no impact on the environment will constitute an explicit environmental claim. Accordingly, environmental labels within the scope of the Green Claims Directive are subject to the same requirements as other environmental claims within the meaning of Art. 1 No. 1 2 lit. o of the Amending Directive, whereby the term "explicit environmental claim" was deleted in the Amending Directive following the vote of the Committee on the Internal Market and Consumer Protection of the European Parliament on 28 November 2023.

Sustainability labels

In addition, sustainability labels awarded on the basis of "self-certification", where there is no third-party verification and no regular monitoring of compliance with the requirements on which the sustainability label is based, are to be prohibited in future.

Evaluation and justification system

Explicit environmental claims are to be assessed and justified by companies using a special system. Article 3 of the Green Claims Directive sets out the framework conditions for the evaluation and justification system.

Comparative explicit environmental claims

Article 4 of the Green Claims Directive introduces new requirements for comparative environmental claims. In particular, the data and information used for the comparison must

be presented. The environmental impacts along a product's value chain must also be taken into account. These environmental claims must also be substantiated.

Labelling obligations

New labelling requirements are also added. Information on explicit environmental claims must be made easily accessible, while at the same time taking into account particularly vulnerable groups of consumers (e.g. the elderly). This is probably one of the most important new regulations under the Green Claims Directive. Until now, there has been no clear regulation at national level on how environmental claims should be labelled or where the labelling should be placed on or near the product.

According to Art. 5 (6) of the Green Claims Directive, the information can be provided via a QR code, a web link, in physical form or in another similar form. Thus, the trader has the right to choose between the forms of presentation not exhaustively listed in Art. 5 (6) of the Green Claims Directive. The information shall include at least the following:

- environmental aspects, environmental impacts or environmental performance covered by the claim;
- the relevant Union or the relevant international standards, where appropriate;
- the underlying studies or calculations used to assess, measure and monitor the environmental impacts, environmental aspects or environmental performance covered by the claim, without omitting the results of such studies or calculations and, explanations of their scope, assumptions and limitations, unless the information is a trade secret in line with Article 2 paragraph 1 of Directive (EU) 2016/943;
- a brief explanation how the improvements that are subject to the claim are achieved;
- the certificate of conformity referred to in Article 10 regarding the substantiation of the claim and the contact information of the verifier that drew up the certificate of conformity;
- for climate-related explicit environmental claims that rely on greenhouse gas emission offsets, information to which extent they rely on offsets and whether these relate to emissions reductions or removals;
- a summary of the assessment, including the elements listed in this paragraph, that is clear and understandable to the consumers targeted by the claim and that is provided in at least one of the official languages of the Member State where the claim is made.

Green Claims List

However, there is still a lack of a positive list of permissible generic environmental claims, such as the one that already exists in the Health Claims Regulation for health claims in food advertising. Such a list of green claims would provide a clear and practical way of communicating the requirements for authorised generic environmental claims.

6. Tension between the EU Organic Regulation and the Green Claims Directive and the Amending Directive

With regard to the EU Organic Regulation, there are a number of contradictory wordings in both the Amending Directive and the Green Claims Directive that require clarification.

6.1. Contradictions in relation to the EU Organic Regulation

The Amending Directive is inconsistent with the EU Organic Regulation in the examples of prohibited generic environmental claims without recognised outstanding environmental performance. For example, labelling a product as "organic", "ecological" or "biobased" or with other similar claims is to be prohibited, as according to recital (9) of the Amending Directive this does not constitute recognised environmental excellence. However, according to Art. 30 Para. 1 of the EU Organic Regulation, all products that comply with the requirements of the Regulation during production may be labelled as organic or with similar meaningful wording.

6.2. Contradictions in relation to the Green Claims Directive

The Amending Directive also contradicts the Green Claims Directive on this point, as it prohibits generic environmental claims if there is no outstanding environmental performance, whereas under the Green Claims Directive, generic environmental claims are subject to substantiation and - provided they are properly substantiated - may still be allowed. It is also problematic in this context that the two proposed directives provide for different legal consequences for the same offence.

The use of logos, quality labels and other labelling is also more strictly regulated by the draft Green Claims Directive. Private labels and quality marks will continue to be possible, but they must also be certified by a state authority, otherwise their use will constitute an unfair act under Annex I No. 2a of the Amending Directive. However, the application of the labels themselves will not be controlled, provided that the labels are subject to state certification.

6.3. Political fields of action

The identified contradiction between the Amending Directive and the EU Organic Regulation should be resolved by the European Commission by clarifying the relationship between this provision of the Amending Directive and the EU Organic Regulation. The

contradictory wording should be explained and, if necessary, resolved by aligning the text of the two proposed directives.

7. Tension between the EU Organic Regulation and the Green Claims Directive

There is a clear tension between the Green Claims Directive and the EU Organic Regulation. It is true that Article 1(1)(b) of the Green Claims Directive excludes the application of environmental labelling schemes and environmental claims that comply with the requirements of the EU Organic Regulation. As a result, the Organic Regulation takes precedence over the Green Claims Directive. However, this raises questions regarding the different underlying requirements and certification systems.

7.1. Difficulties in application

It is noticeable that, within the meaning of the Green Claims Directive, an explicit or implicit statement and the presentation of a product or a trader suggesting that the product or the trader's actions have a positive or no impact on the environment is already considered an environmental claim in accordance with Art. 2 No. 1 in conjunction with Art. 2 lit. o) of the Amending Directive. Consequently, these environmental claims must be substantiated ex ante in accordance with Art. 3 of the Green Claims Directive. According to Art. 1 sentence 2 of the Green Claims Directive, such substantiation must take into account internationally recognised scientific approaches to the determination and measurement of environmental impacts, environmental aspects and environmental performance of products or traders, thus leading to reliable, transparent, comparable and verifiable information for consumers.⁶

In comparison, the labels, symbols and environmental claims declared permissible by the EU Organic Regulation may only be used if the production rules of this Regulation have been complied with. The EU Organic Regulation lays down production rules for plant cultivation, animal husbandry, further processing and the import of products of agricultural origin. Not only the production methods, but also the means of production are significantly restricted for the purpose of environmentally friendly food production. Compliance with these production standards throughout the value chain is checked at least once a year by the competent control authorities.

Accordingly, any environmental claim that is not mandatory and describes environmental effects is subject to a substantiation obligation under the Green Claims Directive. The problem lies in the categorisation of whether an environmental claim is regulated by the EU Organic Regulation or the Green Claims Directive.

⁶ Recital (15) of the Green Claims Directive.

While environmental claims permitted under the Green Claims Directive "only" pose a "problem" in terms of the criteria for substantiating the claim, a misapplication of one or other of the legal bases could have devastating consequences for the environmental communication of food manufacturers. **Environmental claims referring to the organic production method as defined in the EU Organic Regulation are unproblematic, as the EU Organic Regulation takes precedence.**

The Green Claims Directive is intended to apply primarily to "explicit environmental claims", whereby the expressiveness is determined solely by the form of presentation, e.g. as a product-related environmental claim or as a label. In this context, according to recital (9), statements that specifically refer to the particularities of organic production and fulfil the requirements of the EU Organic Regulation should be permitted. For example, the statement "free from chemically synthetic pesticides and fertilisers" is permitted.

The interpretation is stricter for statements that "concern the positive effects of organic farming on biodiversity, soil or water". The main benefits of organic production methods consist of five core elements: Climate protection, species protection, water protection, soil protection and animal welfare.⁷ It is important that the positive effects are linked to the organic production method. This can prevent the scope of the Green Claims Directive from being opened up.

In conclusion, environmental claims as defined by the EU Organic Regulation, e.g. about the packaging material, are not permitted. For environmental claims relating to the packaging material, the proposed Green Claims Directive would have to be used and the claim in question substantiated. **The line must therefore be drawn where environmental claims about products leave the scope of the EU Organic Regulation and the associated certification requirements. This is where the Green Claims Directive comes into play and (elaborate) substantiation of the claim becomes necessary.**

The situation of organic operators who, as part of their membership of a private label organisation, have undertaken to comply with stricter requirements than those of the EU Organic Regulation, is currently unclear. In principle, the scope of application of the Green Claims Directive would probably be reopened here. It is still unclear from the proposal of the Green Claims Directive whether such obligations would be recognised as general scientific knowledge beyond the EU Organic Regulation.

7.2. Political fields of action

Both the Green Deal and the Farm-to-Fork Strategy provide for the promotion of organic farming. **For this reason, it would at least make sense not to burden the certificate**

⁷ Federal Ministry of Food and Economic Affairs: Organic farming in Germany, p.5, https://www.bmel.de/SharedDocs/Downloads/DE/Broschueren/Oekolandbau-Deutschland.pdf?__blob=publicationFile&v=4; [last accessed on 25 October 2023](#).

holders of private organic standards (e.g. Demeter, Bioland and Naturland (Germany) or KRAV (Sweden)), whose standards are based on Regulation (EU) 2018/848 but who voluntarily subject themselves to significantly stricter rules and requirements, with an additional system to substantiate their environmental claims. Especially as these standards are also verified by the established system of annual inspections by competent control authorities (e.g. the organic control bodies in Germany). It would make sense to make appropriate changes to the proposed Green Claims Directive before adopting it.

8. Methods of substantiation

In Art. 3 of the current proposal for the Green Claims Directive, member states are to oblige commercial operators to carry out an assessment to substantiate explicit environmental claims.

8.1. Substantiation by the PEF method

In future, companies will be required to calculate and present their environmental performance in a reliable and verifiable manner.⁸ The European Commission currently continues to recommend the use of the PEF to illustrate environmental impacts.⁹ The assessment is based on 5 steps:

- Step 1: Defining the goal and scope
- Step 2: Analysing the current situation
- Step 3: Impact assessment
- Step 4: Interpretation and reporting
- Step 5: Verification and validation

In principle, the PEF is an effective method for determining the environmental impact. However, the European Commission itself acknowledges in its final draft of the Green Claims Directive that the application of the PEF methodology is not equally suitable for the assessment of all product categories. Recital 32 of the draft directive therefore states, with reference to food and agricultural products, that before the adoption of the Product Environmental Footprint Category Rules (PEFCRs) can be considered for these product categories, aspects such as biodiversity, the positive external effects of extensive agriculture or animal welfare measures need to be included in the methodology. For this reason, the final draft of the Green Claims Directive is no longer strictly based on the PEF

⁸ COMMISSION RECOMMENDATION of 16/12/2021 - C (2021) 9332 final, No. 14.

⁹ Recital (32) of the Green Claims Directive.

methodology, as originally intended, but only requires in Art. 3 (1) (b) of the Green Claims Directive that relevant international standards are taken into account in the justification. However, the wording leaves open which relevant standards are meant here.

8.2. Political fields of action

The current proposal for the Green Claims Directive stipulates that primary data should be prioritised as the data basis for substantiating environmental impacts, environmental aspects or environmental performance. Where this is not possible, relevant secondary data may be used. **In the production of food and agricultural products, the collection of primary data for raw materials from the agricultural upstream chain is particularly difficult, as these processes are not always the responsibility of the operators and data collection would involve a high level of personnel and time expenditure. This poses a major hurdle in particular for small and medium-sized enterprises (SMEs).** Moreover, this problem is further exacerbated when companies source their raw materials not only nationally, but also at European or international level.

In this context, it should be noted that the results of the Öko-PEF project indicate that the demand for relevant secondary data within the framework of the Green Claims Directive by organic food companies would also be associated with considerable challenges in view of the currently very limited data situation and availability. **This is because there are currently hardly any suitable differentiated secondary data sets for organic food that could be used to calculate the PEF or similar methods. This can lead to indifferent results with regard to the environmental performance of organically and conventionally produced food and can put SMEs in particular at a considerable disadvantage.**

For this reason, it would be advisable to first create a sufficiently differentiated data base in order to ensure a sensible and legally compliant implementation of the recommended methods for substantiation.

Assoziation ökologischer Lebensmittelhersteller e.V (AöL).

The Association of Organic Food Processors (AöL) represents the interests of the organic food processing industry in German-speaking Europe. The tasks of the AöL include the political representation of interests as well as the promotion of exchange and cooperation among its members. More than 130 AöL companies, ranging from small and medium-sized enterprises to internationally active companies, generate a turnover of over 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.

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FiBL Germany is a registered non-profit association and provides scientific expertise on current issues in organic farming and food sector. It conducts interdisciplinary and practice-oriented research together with farmers and experts from science and industry. So, knowledge from research is swiftly transferred into practice.

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The law firm WBS.LEGAL, headquartered in the heart of the media capital Cologne, has been one of Germany's renowned and leading law firms in the field of media and copyright law for over three decades. WBS.LEGAL's team of highly qualified lawyers also specializes in food law and competition law, IT and Internet law, as well as data protection, e-commerce, trademark and employment law. WBS.LEGAL has in-depth expertise and experience in the field of food and food labeling law and has been advising companies in the food production and trade sector for more than 30 years. The law firm maintains an extensive network of contacts in this area and provides its clients with individual step-by-step support for their projects.

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