CONSEIL NATIONAL DE L'EMBALLAGE (CNE)
FRENCH PACKAGING COUNCIL

Communication of packaging environment impacts

Position Paper

CONTEXT AND STATEMENT OF REASONS

• In France, as in several Europeans countries and at the international level, the number of initiatives for environmental indicators about life cycle related to packaging, transport or packed products and their communication has dramatically increased in the past few years. These initiatives reflect the new concerns from the society and increasing awareness of environmental issues by stake holders: industry, interest groups, NGOs and public authorities.

• Several members of the CNE launched, in our country, pioneering initiatives, individual or collective, which paved the way and, thus, highlighted the issues but also the complexity of the environmental labelling risks associated with the disparity of approaches and the lack of common language. Others question the soundness of the approach, given by the confusion engendered towards consensus and by the costs for companies and products.

• In the current state of French legislation, the environmental labelling is not subject to any obligation. However, the bills from the Grenelle Environment, under consideration, are acting on the principle (art. 47 of the Grenelle 1)[1] and drafting the terms and conditions (art. 85 of the Grenelle 2)[2], on the basis of proposals made by the Operational Committee 23 of Grenelle of the environment.

• To allow companies to meet their obligations, the ADEME and the AFNOR has been entrusted to lead the development of a referential of good practices, published in July 2008 and are currently working to define a method by product categories. The CNE and several of its members contribute to the work of the platform thus created.

• It is clear that consumers buy packaged products and not empty packaging. The studies confirm, in this respect, the common sense while it is not to consider packaging as a stand above item, whereas their sensitivity to packaging have been increased.

• The relative share of the packaging in the different environmental impacts of the packaged products, throughout its life cycle (including the use of the product) varies depending on the environmental indicators and the families of products. Within the same product category, the manufacturing process or the conservation method often induce the type of packaging.

• The diversity of methodological approaches, the need for accuracy and clarity of the environmental information to be returned to consumers have led members of the French Packaging Council to make collective recommendations to objectify the discussion, to improve the accuracy of information and to assess the relevance of communication.

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[1] Art 47 from the bill Grenelle 1 (as adopted by the Senate in first reading) «*The mention of the environmental impacts of products, in addition to the display of prices, will be gradually developed, including at the community level, as the labelling and the availability of information on the shopping sites, their origin and the social conditions of their production. The methodology combined with the assessment of these impacts will result in a dialogue with the professionals concerned* »

[2] Art. 85 from the bill Grenelle 2 : «*From January the first 2011, the consumer must be informed by means of marking, labelling, display or any other suitable process,of the equivalent carbon content of products and their packaging as well as the consumption of natural resources or impacts on natural environment which are attributable to these products during their cycle life ...* »

• In contrast to the prevention of packaging waste by the source reduction, the CNE has not, however, intended to develop frameworks and tools, all that exists and some are standards. In the other hand, the CNE is legitimate to take a position on their use, their operation, and to put the topic in the right perspective in order not to mislead consumers.

FRENCH PACKAGING COUNCIL POSITION

• Any communication to consumers should be based on a fair information (accurate, verifiable, objective ...), understandable and relevant, especially when it aim to guide their choices. If the environmental information does not meet these criteria, it should not be.

• Consumers' perception and understanding are paramount. The misguided information, because incomplete or incorrect, should be banned.

• The CNE has established since 1997 to consider the whole system of packaging (primary, secondary and tertiary), when one deals with the prevention of waste, source reduction, or environmental impacts of the product's packaging ("product – packaging" couple).

• The CNE considers that it is appropriate not to separate the environment labelling of the packaging from the packaged product labelling and supports the terms of the bill which seek information "on global characteristics of the couple product / packaging".

• It recommends refraining from marking the environmental impacts of the packaging alone.

• Impacts assessments must be carried out using complete life cycle assessment (LCA), ie multi-steps, from the extraction of raw materials and the generation of resources to the management of the end of life and the final disposal, without omitting the stages of production and use. To optimize the costs of implementation and not to outbid the products' prices, the use of generic data and specific data should be combined.

• The CNE remind that the LCA are multi-criteria and are not limited to the assessment of greenhouse gas. The use of CO_2 as unique criteria is reductive and can obscure other dominated impacts for some activities. The CNE recommends, for packaging, not to select, a priori, the one or two impact indicators which are apparently the most significant at the stage of its production, since all environmental impacts must be combined at the level of the packaged product, to identify the more relevant criteria.

• The LCA is one of the standard tools (ISO 14040 and 14044) available for companies to enable them to identify the main environmental impacts of their activities, to measure the various issues and to set goals to improve environmental performances. LCA were not initially designed for competitive applications and communication. The CNE recommends to use it first as an internal optimization tool and then with partners upstream and downstream the supply chain. Outside information can not be considered without a prior review of the work by external experts (critical review including the recent LCA progress, not yet reflected in the standard form, as sensitivity analysis).

• Insofar as it is intended by government to generalize the communication of environmental impacts to all products, the CNE recommends evaluating first the economic impact resulting from collection, processing and updating of data for companies, especially SMEs, and for consumers. The environmental approach can not overcome the economic and social dimensions from sustainable development.

• Methodological approaches and ways of possible return of the information have to be considered in a European or international context; and we will ensure they do not impede the functioning of the EU inner market and supply chain disruption. In case of a mandatory labelling of the environmental impacts of products, the CNE recommends the implementation of a harmonized European.

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Consumer associations,
Environmental protection associations
Local authorities.