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Cc: Commissioner for Enterprise and Industry, The European Food Sustainable Consumption and Production Roundtable (SCP Roundtable)/Landmark Europe, European Environmental Agency (EEA) and UNEP

Mr. Potocnik,

Thank you for your letter of 1 June.

You say “broad stakeholder participation [is] a key requirement for the relevance and broad ownership of the initiative.” We agree.

We are keen to know, in that case, what the European Food Sustainable Consumption and Production Roundtable is doing to ensure non-industry participation, as there are still zero non-industry members listed on the website. There is only one NGO-network listed as an observer, not a member (European Environmental Bureau).

You say your consultation “stimulated interest and involvement in the process by civil society organisations,” but our experience is that few knew the Roundtable existed, let alone that there was a consultation.

We have read the 3 June paper *Consultation Follow-up: Feedback from Stakeholders and Round Table Comments* (www.foodscp.eu/files/consultation/RTConsultationResponse8June2010_CLEAN.pdf) and note that of a mere 11 submissions noted, three were from Roundtable members or observers, one was from the UNDP, one was from the French Development Ministry and four were from industry bodies like BASF and Fediol. We do not see “interest” from civil society in this process. Perhaps you could point us to other sources of information on this.

We note that the comments that were submitted reflect fundamental problems with the Roundtable approach, including the lack of independent verification of claims (p 12), the exclusion of social impacts (pp 4, 5, and 13) and the lack of civil society participation (p 8). We note the Roundtable response that, “In the second phase, the RT will consider the conditions for independent peer-review of the environmental assessment and communication of food and drink products,” but this raises further concern that rather than being a fundamental criteria for success, independent review will be subject to “conditions” negotiated by those to be scrutinised.

Similarly, we note the significant comment from the European Environment Bureau (p13) that:

The 3 principles include 2 of the “3Cs” on public information from consumer research, those of “clarity” and “comparability”. The 3rd of these principles is “credibility”, based on consumer demands to have realistic, accessible and verifiable information.

The Roundtable comments that, “The credibility of the RT is addressed by having most of the major stakeholders around the RT.” This is clearly untrue, simply does not address the credibility concern, and in fact exposes the bias of the initiative. Industry is only one segment of stakeholders, and the Roundtable appears to be suffering from a chronic failure to secure civil society participation (due to lack of credibility) to represent other segments. Simply stating “all data sources shall be credible” is not enough.

The EEB further express concern about what the Roundtable will actually achieve:

*The principles of application and continuous improvement are key, to ensure as wide a take-up for consistency and comparability, and to ensure improvements are made. Despite this, we have a number of concerns with these principles. Firstly, Principle 8 proposes limits to procedures and requirements for assessment so that companies of all types, including SMEs, can assess their products. **We are concerned that this could limit the assessments so much that it either renders the assessments mostly empty of information, or limits them in scope of environmental impacts. A narrowed scope could end up addressing only those issues where consumer interest is deemed strongest, for example on climate change, even though this is not the biggest environmental impact of the product** [emphasis ours.]*

It is also noteworthy that the French Sustainable Development Ministry felt the need to make repeated suggestions to include environmental considerations in key provisions of the objectives and principles. This reveals the lack of consideration for these issues in the first place, demonstrating to us the overriding commercial nature of the Roundtable rather than its commitment to sustainability.

We find it extraordinary that the European Environment Agency felt the need to offer its involvement: “We will be happy to explain our work and how it could contribute to the Food SCP RT in more detail.” It is difficult to understand why this was necessary given they are listed as a “supporting organization.”

In light of this mounting credibility vacuum, and the fundamental questions hanging over what will be achieved by the Roundtable in the absence of any participation wider than the vested interests, we cannot see how the Commission can substantiate a position that the Roundtable has the “broad stakeholder participation” acknowledged to be “a key requirement for the relevance and broad ownership of the initiative.”

We therefore reiterate our concerns and believe there is now increased urgency for the Commission to withdraw support for what is clearly an industry public relations exercise.

Yours sincerely,

Food and Water Europe

Corporate Europe Observatory