



Market Access Secretariat
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Submitted Via email aafc.mas-sam.aac@agr.gc.ca

June 16, 2023

To Whom It May Concern:

RE: *European Commission proposed Green Claims Directive*

On behalf of our members across the fresh fruit and vegetable supply chain, the Canadian Produce Marketing Association is pleased to offer comments on the European Commission's proposed *Green Claims Directive*.

About CPMA

Based in Ottawa, the Canadian Produce Marketing Association (CPMA) is a not-for-profit organization representing companies active in the marketing of fresh fruit and vegetables in Canada, from the farm gate to the dinner plate spanning the entire produce industry. The Association's members include major growers, shippers, packers and marketers; importers and exporters; transportation and logistics firms; brokers, distributors and wholesalers; retailers and foodservice distributors; and fresh cut operators and processors. Founded in 1925, CPMA is proud to represent over 830 domestic and international members who are responsible for 90% of fresh fruit and vegetable sales in Canada.

Comments

CPMA recognizes that the European Union is taking measures to combat "greenwashing" and other false sustainability claims that are becoming increasingly prevalent as consumers are seeking more sustainably-produced food.

This policy may support consumers in their decision-making between sustainably produced products and those that are not. Consumer interest in sustainable products is a market driver for businesses to invest in implementing more environmentally sustainable practices. A recent study from Cargill found that 55% of global consumers are more likely to purchase packaged food items that are labelled with a sustainability claim—an increase of four points from the previous year¹. There is an increasingly pressing demand for some form of sustainability-related accountability, leading to a growing number of standards aimed at certifying sustainability claims, whether practice- or outcome-based. Standards are often designed to address specific concerns, resulting in a landscape of partial and partly overlapping frameworks. Buyer expectations may include meeting a particular standard in addition to other requirements to meet sustainability targets. This leads to organizations having to comply with a set of

¹ [Cargill, 2022](#)

different standards to substantiate the very same practices or outcomes, multiplying the cost incurred without much value added.

The Canadian Food Inspection Agency has indicated it will be opening a consultation on consumer value claims by 2024, including sustainability claims, and the results from this consultation should inform Canada's regulatory and policy approach as well as efforts to harmonize regulations and reduce trade barriers between countries. At the same time, the scope and meaning of the term "sustainability" are ever-changing, driven by the progress of scientific knowledge, innovation, and shifting social norms and values. Consequently, it is anticipated that sustainability standards will evolve and may continue to multiply, in conjunction with a growing need for harmonization to improve efficiencies throughout the value chain. As noted in the *Green Claims Directive Proposal*, a 2020 study indicates that a considerable share of environmental claims (53.3%), across the EU and across a wide range of product categories, provide vague, misleading, and even unfounded information about products' environmental characteristics. Here at home, a private-public coalition of over 120 diverse partners, including CPMA, is working to establish Canada's first agri-food sustainability index to demonstrate our country's rightful place as a leader in sustainable, safe, and responsibly produced food. The National Index on Agri-Food Performance will provide an essential tool to benchmark Canada's food production against global best practices and environmental, social, and health priorities, and to align with global sustainability frameworks.

As noted above, CPMA emphasizes that the first step in any such effort must be to define the terms under consideration/acceptable as consumer claims. This would help ensure a clearer understanding of how to substantiate claims per the General Guidelines on Claims and support science-based sustainability-related labelling claims. The establishment of principles to assist governments (or other stakeholders) in developing, implementing, or regulating sustainability-related labelling will facilitate harmonization between trading partners and establish a foundation for national legislation and/or regulations. In addition, governments and industries must come to consensus on standards for sustainability to alleviate costly duplication of reporting/auditing and to support trade both domestically and internationally.

Sincerely,

A handwritten signature in black ink, appearing to be 'RL' followed by a horizontal line.

Ron Lemaire
President
Canadian Produce Marketing Association