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Extending Ecolabelling in Response to Climate Change

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16.1 Introduction

Following the Paris Agreement – the central outcome of the eponymous 2015 climate summit[1] – the parties decided to implement the objectives envisaged since the beginning of the 1990s via the United Nations Framework Convention on Climate Change (UNFCCC)[2] as the result of the United Nations Conference on Environment and Development (UNCED) of June 1992.[3] The set goals are to be achieved gradually between now and 2035 and, within this framework, agriculture and food security featured prominently in the Conference of the Parties (COP) 28 that took place in December 2023. Against this backdrop, precise sustainability policies are remarkably at the heart of the 2030 UN Agenda for Sustainable Development[4] and the Governments Step Up Action on Agriculture and Food Security[5] has arisen as a key climate change challenge: food production that reduces carbon emissions contributes significantly to improving sustainable policies and the development of a circular economy is a critical factor in this process. Thus, in order to ensure a sustainable future with low-carbon emissions, it is necessary to outline production processes that are responsible and transparent. For this reason, it is essential not only to identify specific policies that enable healthier and less-polluting production cycles, but also to inform the consumer in a proper way to allow an economic and sociocultural transformation.

A clear example of how sociocultural sustainability can be achieved is the establishment of a comprehensive labelling system that provides not only nutritional information but also data on the environmental impact of food products. Arguably, the progressive extension of environmental labelling from non-food products to food products is emerging as a key factor within the context of climate change policies. In this process, there is a profound interest in identifying new labels, notably environmental labels, with a dual purpose: outlining certifying processes suited to a sustainable and safe development on the one hand, and helping the consumer to make conscious choices when purchasing products on the other.

[1] Paris Agreement, opened for signature 22 April 2016, entered into force 4 November 2016.
[2] United Nations Framework Convention on Climate Change, opened for signature 17 December 1994, entered into force 16 April 1998.
[3] Also known also as the 'Rio Conference' or the 'Earth Summit'.
[4] See United Nations, The Sustainable Development Agenda (2023). www.un.org/sustainabledevelopment/development-agenda.
[5] UNFCCC, Governments Step up Action on Agriculture and Food Security at COP27 (2022). https://unfccc.int/news/governments-step-up-action-on-agriculture-and-food-security-at-cop27.

This contribution aims to explore the possible evolution of a new food environmental labelling system. It analyses the increasing interaction between climate change and food and the implications it may have for labelling. The research first explores the international trajectory and subsequently delves into the implications it may have on the EU's ecolabelling system.

16.2 Food Security and Climate Change: Towards a Nutritional Environmental Label

Ecolabelling has evolved over time – albeit voluntary, it is progressively expanding to new products. New impetus for such developments has particularly come from the awareness of the link between food security and climate change.

At the domestic level, in 2010 the British Food Standards Agency commissioned a report on the effects of climate change on food.[6] In 2015, awareness that food production and climate change are closely intertwined arose in the international community, particularly via COP21, and the messaging of both the Food and Agriculture Organisation (FAO) and UN. Indeed, the FAO determined that the food system 'must be considered in the context of . . . climate change and the depletion of natural resources'.[7] As they are 'major contributors to [greenhouse gas] emissions, amounting to about one-third of global emissions, it is imperative that food systems evolve to sustainably meet the growing demand globally'.[8] In this context, agriculture emerges as 'a significant source of greenhouse gas emissions' and the targets of the Paris Agreement make it 'essential that agriculture and other land-use sectors be part of the climate solution'.[9] Indeed, 'it is increasingly clear that the goals of achieving food security and sustainable agriculture and addressing the challenges of climate change are intertwined and need to be addressed in a coordinated manner'.[10] Along these lines, in 2019 the newly established Lancet Commission on healthy diets from sustainable food systems,[11] established under the auspices of the world-leading *Lancet* medical journal, underscored that the 'transformation to healthy diets from sustainable food systems is necessary to achieve the UN Sustainable Development Goals and the Paris Agreement'.[12] Developed countries should therefore 'share views on how to encourage more balanced diets and minimize emissions per calorie',[13] raising the question as to 'what are the financial and technological solutions for achieving just transition for food security and climate resilient food systems'.[14]

[6] I. R. Lake, A. Abdelhamid, L. Hooper, Food and climate change: a review of the effects of climate change on food within the remit of the Food Standards Agency (Food Standards Agency, 2010). www.food.gov.uk/sites/default/files/media/document/575-1-1008_X02001__Climate_Change_and_Food_Report__28_Sept_2010.pdf.

[7] Food and Agriculture Organisation (FAO), Sustainable Food Systems: Concept and Framework (2021) p. 1. www.fao.org/3/ca2079en/CA2079EN.pdf. See also FAO, Climate Change and Food Security: Risk and Responses (2015). www.fao.org/3/i5188e/I5188E.pdf.

[8] The Sharm El-Sheikh Climate Implementation Summit, Round Table on 'Food Security' (7 November 2022), p. 1. https://cop27.eg/assets/files/days/COP27%20FOOD%20SECURITY-DOC-01-EGY-10–22-EN.pdf.

[9] FAO, Transforming Food and Agriculture to Achieve the SDGs (2018), p. 49. www.fao.org/3/I9900EN/i9900en.pdf.

[10] Ibid.

[11] See W. Willett, J. Rockström, B. Loken, et al., Food in the Anthropocene: the EAT–Lancet Commission on healthy diets from sustainable food systems *The Lancet* 2019, 393(10170): 447–492.

[12] Ibid. at p. 448 (emphasis added). For a critique, see F. J. Zagmutt, J. G. Pouzoo, S. Costard, The EAT–Lancet Commission: a flawed approach? *The Lancet* 2019, 394(10204): 1140–1141; and the reply of the EAT–Lancet Commission: W. Willett, J. Rockström, B. Loken, The EAT–Lancet Commission: a flawed approach? – Authors' reply. *The Lancet* 2019, 394(10204): 1141–1142.

[13] The Sharm El-Sheikh Climate Implementation Summit, Round Table on 'Food Security' (7 November 2022), p. 3.

[14] Ibid.

Along these lines, the Intergovernmental Panel on Climate Change (IPCC) adopted a strategy and commissioned a report on food security[15] that will be undoubtedly debated in upcoming sessions of the IPCC. The idea that sustainable food systems can contribute to 'lowering emissions of critical climate-warming gases, including methane and carbon dioxide' has thus become a cornerstone of the UN 2021 Food Systems Summit. Similarly, the International Food Policy Research Institute (IFPRI) considered that 'food systems contribute substantially to greenhouse gas emissions and must play a role in mitigation through changes in agricultural practices and land use, more efficient value chains, and reduced food loss and waste'[16]. Food therefore scores high on the COP28 agenda, as demonstrated by initiatives such as FAST (Food and Agriculture for Sustainable Transformation Initiative),[17] iCAN (the Initiative on Climate Action and Nutrition)[18], and the Roadmap for More Sustainable Food Systems.[19]

This approach triggers the necessity of installing responsible consumption and production under sustainable development goal 12 and to create a synergy with reduced environmental impact and climate action under sustainable development goal 13.[20] Central to this strategy is the need to inform the consumer about products that follow high-yielding, resilient and adaptive practices (HYRAP),[21] particularly via food environmental labelling.[22] Support instruments are thus being created by institutions directly involved in the sector, claiming a precise role for ecolabels as a solution to climate change mitigation.[23]

16.3 The European Union Trajectory

16.3.1 From the 'Community Eco-Label Award Scheme' to the 'EU Ecolabel'

Environmental labelling has essentially developed as a voluntary, and therefore not compulsory system, including three mechanisms[24]: (a) type I environmental labelling[25];

[15] IPCC, Food security, in *Climate Change and Land* (Cambridge University Press, 2022), pp. 437–450. https://doi.org/10.1017/9781009157988.007.

[16] IFPRI, Global Food Policy Report 2022: Accelerating Food Systems Transformation to Combat Climate Change. 2022, p. 6. https://ebrary.ifpri.org/utils/getfile/collection/p15738coll2/id/135889/filename/136101.pdf. See further Center on Global Energy Policy (School of International and Public Affairs, Columbia University), Food and Climate – Infoguide, 2021. www.energypolicy.columbia.edu/sites/default/files/file-uploads/FoodandClimate-Infoguide-CGEP-MASTER-v2A.pdf.

[17] The aspirational goal of FAST is 'to implement concrete actions that would result in improving the quantity and quality of climate finance contributions to transform agriculture and food systems by 2030, to support adaptation and maintain a one and a half degree pathway whilst supporting food and economic security' (FAO, Food and Agriculture for Sustainable Transformation Initiative – FAST. 2022, p. 1. www.fao.org/3/cc2186en/cc2186en.pdf).

[18] One of the objectives of I-CAN is 'to champion the need to connect actions to accelerate progress in both climate (mitigation and adaptation) and nutrition'; see: World Health Organization, Initiative on Climate Action and Nutrition (I-CAN). 2022, p. 1. www.gainhealth.org/sites/default/files/publications/documents/Initiative-on-climate-action-and-nutrition-I-CAN.pdf.

[19] See K. F. Davis, C. Dalin, M. Kummu, et al., Beyond the green revolution: a roadmap for sustainable food systems research and action. *Environmental Research Letters* 2022, 17: 100401.

[20] ONU, The Sustainable Development Goals Report (2022). https://unstats.un.org/sdgs/report/2022/The-Sustainable-Development-Goals-Report-2022.pdf.

[21] M. Li, C. A. Petersen, N. E. Tautges, Scow K. M., A. C. M. Gaudin, Yields and resilience outcomes of organic, cover crop, and conventional practices in a Mediterranean climate. *Scientific Reports* 2019, 9: 912283. https://doi.org/10.1038/s41598-019-48747-4.

[22] Compare to FAO, Climate Change and Food Security: Risk and Responses, 2015, fn. 95.

[23] Global Ecolabelling Network (GEN), Ecolabels and Their Role in Mitigating Climate Change (October 2022). www.onepla netnetwork.org/sites/default/files/from-crm/GEN_white_paper_Oct_2022%2520final%2520version%2520for%2520release%2520%25281%2529.pdf.

[24] ISO 14020:2000 Environmental Labels and Declarations – General Principles. www.iso.org/obp/ui#iso:std:iso:14020:ed-2:v1:en.

[25] ISO 14024:2018 Environmental Labels and Declarations – Type I Environmental Labelling – Principles and Procedures. www.iso.org/obp/ui/#iso:std:iso:14024:ed-2:v1:en.

(b) type II self-declared environmental claims[26]; and (c) the International Organisation for Standardization (ISO) type III environmental product declaration.[27] These all contribute to the environmental information process and help to identify and promote environmentally friendly products and services that have a higher environmental performance standard. Given that schemes (b) and (c) provide no certification by an independent body and rely on mechanisms such as information communicated by companies,[28] this chapter will focus on type I labels, which require certification by an independent body through a series of criteria and assessment and verification requirements.

A clear example of type I labelling is the Ecolabel certification, which has been around for three decades, evolving from the 'Community eco-label award scheme' to the current 'EU Ecolabel'. As far back as 1992, a petition of the EU Council proposed an eco-labelling scheme covering environmental impacts during the entire life cycle of a product.[29] This established the 'Community eco-label award scheme', a system that initially expressly excluded eco-labelling not only for pharmaceutical products but also for beverages and foods.[30]

The importance of improving the regulation of the eco-label system led to a revision of the 1992 resolution, introducing a new scheme based on two regulations that came into force in 2000. In this context, the 'Community eco-label award scheme' was revisited via Regulation (EC) No. 1980/2000,[31] which was later repealed in 2010 by the 'EU Ecolabel'[32] 'for reasons of clarity and legal certainty'.[33] This gradually extended the range of goods or services so as to encompass drinks and foodstuffs, only excluding medicinal products for human use.[34] A key feature of the 'EU Ecolabel' regulation is that it is not compulsory.[35] The complexity of this labelling system is progressively increasing, necessitating the creation of a European Union Ecolabelling Board (EUEB) contributing to the development and revision of ecolabelling criteria and implementation schemes.[36] Group product development is also envisaged; although mostly relating to non-food products and services in the clothing and textile sectors, it also takes in such fields as coverings, do-it-yourself enterprise, electronic equipment, furniture, gardening, lubricants, others household items, paper, and personal care products. Even though Regulation 66/2010 of the European Parliament and Council on the EU Ecolabel is applicable to food (per article 6.5), more care is required

[26] See ISO 14021:2016 Environmental Labels and Declarations – Self-Declared Environmental Claims (Type II Environmental Labeling). www.iso.org/obp/ui/#iso:std:iso:14021:ed-2:v1:en.

[27] ISO 14025:2006 Environmental Labels and Declarations – Type III Environmental Declarations – Principles and Procedures. www.iso.org/obp/ui/#iso:std:iso:14025:ed-1:v1:en.

[28] These are self-declared environmental claims and environmental labels and declarations (EPDs). The latter are based on life-cycle analysis (LCA) conducted according to rules and requirements defined in Product Category Rules (PCRs). See UNI EN ISO 14040:2006; UNI EN ISO 14044:2006; ISO/TS 14072:2014 Environmental Management – Life Cycle Assessment – Requirements and Guidelines for Organizational Life Cycle Assessment.

[29] Council Resolution of 7 May 1990 on Waste Policy, OJ L 90 No. C 122/2 (18 May 1990).

[30] Article 2: 'This Regulation shall not apply to food, drink or pharmaceuticals'. See Council Regulation (EEC) No. 880/92 of 23 March 1992 on a Community eco-label award scheme, OJ L 99 (11 April 1992).

[31] Regulation (EC) No. 1980/2000 of the European Parliament and of the Council of 17 July 2000 on a Revised Community Eco-label Award Scheme, OJ L 237 (21 September 2000).

[32] Article 5(1) of Regulation (EC) No. 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel, OJ L 27 (30 January 2010).

[33] Ibid., section 19. [34] Ibid., article 2(2). [35] Ibid., article 1.

[36] Ibid., article 5(1). The EUEB was approved via Commission Decision 2000/730/EC of 10 November 2000, Establishing the European Union Eco-labelling Board and its Rules of Procedure (notified under document C(2000) 3280), OJ L 293 (22 November 2000).

for food ecolabelling, not only because information provided to the consumer is a safety requirement,[37] but also because of the express need not to mislead the consumer.[38]

This further led to the creation of the European Food Safety Authority and to laying down targeted food safety procedures, raising the need for a study in relation to food labelling.[39] The study was completed in 2011,[40] and the EUEB supported its findings for food and feed products, despite the opposition of a majority of stakeholders.[41]

16.3.2 Ecolabelling after the Green Deal

With the approval of the Green Deal in 2020, the European Union has clearly moved towards a new market for products that is sustainable and fulfils proper circular economy flows. In this context, the labelling system crosses the challenge of balancing climate change, food security and sustainability. Thus, in November 2022, the European Commission underscored the need to transform the food system via a 'sustainable productivity growth' based on technology and innovation for agricultural productivity that address climate change challenges[42]. On this basis, the Commission is considering the need to 'examine ways to create a sustainable labelling framework that covers, in synergy with other relevant initiatives, the nutritional, climate, environmental and social aspects of food products'.[43]At the same time, the Union adopted a directive on corporate sustainability reporting and the need to provide detailed information on sustainability.

Amid other initiatives aiming to accelerate the transition under the Green Deal,[44] in March 2022 the European Commission adopted the proposal for a regulation on eco-design for sustainable products.[45] The proposed regulation determines technical standards for sustainability, establishing a 'digital product passport' that provides for 'the setting of mandatory green public procurement criteria'.[46] This legislative proposal considerably

[37] See article 14(3)(b) of Regulation (EC) No. 178/2002 of the European Parliament and of the Council of 28 January 2002, Laying Down the General Principles and Requirements of Food Law, Establishing the European Food Safety Authority and Laying Down Procedures in Matters of Food Safety. OJ L 31 (1 February 2002).

[38] Ibid., article 16.

[39] According to article 6(5) of Regulation (EC) No. 66/2010 of the European Parliament and of the Council of 25 November 2009 on the EU Ecolabel, OJ L 27 (30 January 2010).

[40] H. Sengstschmid, N. Sprong, O. Schmid, et al., EU Ecolabel for Food and Feed Products – Feasibility Study (European Commission, 20 October 2011). https://ec.europa.eu/environment/ecolabel/documents/Ecolabel_for_food_final_report.pdf.

[41] European Union Ecolabelling Board, Opinion on the Development of EU Ecolabel for Food and Feed Products (EUEB, 2011). https://ec.europa.eu/environment/ecolabel/documents/EUEB_position_on_food_final.pdf.

[42] This is one of eight coalitions to step up support for global action to transform food systems. See European Commission, Food security: Commission steps up support for global action to transform food systems via eight Global Coalitions. Press release (23 March 2022). https://ec.europa.eu/commission/presscorner/detail/en/ip_22_1971.

[43] Communication from the Commission to the European Parliament and the Council, New Consumer Agenda Strengthening Consumer Resilience for Sustainable Recovery, COM (2020) 696 final (13 November 2020).

[44] See, for example, Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 Setting a Framework for Energy Labelling and Repealing Directive 2010/30/EU, OJ L 198 (28 July 2017). For covered products and energy labelling, see European Commission, Energy Efficient Products (2022). https://commission.europa.eu/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/energy-label-and-ecodesign/energy-efficient-products_en. Another example is the introduction of EU green public procurement criteria (EU GPP) to facilitate the inclusion of green requirements in public tender documents. See Communication, Public Procurement for a Better Environment (COM (2008) 400). https://ec.europa.eu/environment/gpp/eu_gpp_criteria_en.htm.

[45] Proposal for a Regulation of the European Parliament and of the Council Establishing a Framework for Setting Ecodesign Requirements for Sustainable Products and Repealing Directive 2009/125/EC, COM(2022) 142 final 2022/0095 (COD) (30 March 2022).

[46] Ibid., article 1(1).

bolsters the importance of the EU Ecolabel,[47] setting a presumption of product conformity to the ecodesign requirements.[48] However, labelling continues to be non-compulsory, and the Directive does not apply to food.[49] Similarly, forthcoming legislation on packaging and packaging waste adopted at the end of November 2022 bears witness to the effort to thoroughly trace the life of a product, environmental sustainability and labelling,[50] but without express reference to food labelling.

As such, the EU Ecolabel, albeit strengthened via significant legislation and policies after the adoption of the Green Deal, remains secluded from food labelling. It is therefore not yet included in binding regulation, although a trend is emerging towards the inclusion of food products in EU ecolabelling legislation in line with recent international developments, *de lege ferenda*. Notably, the environmental footprint initiative is a proposal of the Commission that aims to measure and communicate the life-cycle environmental performance of organisations and their food and their products 'from a supply-chain perspective, including all stages from raw material acquisition through processing, distribution, use, and end of life processes,[51] and all relevant related environmental impacts (instead of focusing on a single issue)'.[52] This effort takes place in the context of the implementation of the EU's Product Environmental Footprint (PEF) in the course of the Environmental Footprint (EF) pilot phase, which is constantly evolving,[53] and will hopefully lead to a future PEF label also relating to food products,[54] as provided for in its guidelines.

Domestically, some EU Member States have started to include food in their ecolabelling. Notably, in the light of the EU's front-of-pack labelling initiatives,[55] France is considering the possibility of adopting 'Nutri-Score' – a key nutrition information labelling scheme – while simultaneously introducing an environmentally considered food labelling hierarchy. Thus, initially, Nutri-Score should have been complemented by 'Eco-score', a further food environmental labelling system with the same iconographic structure.[56] More recently, Eco-score has

[47] Ibid., article 57. [48] Ibid., article 34.

[49] This exclusion is expressly provided for article 1(2)(a) (ibid.), which will not apply to food as defined in article 2 of Regulation (EC) No. 178/2002. See also European Commission, Communication to the European Parliament, the Council, The European Economic and Social Committee and the Committee of the regions on making sustainable products the norm. COM(2022) 140 final. https://eurlex.europa.eu/legalcontent/EN/TXT/?uri=CELEX%3A52022DC0140&qid=1649112555090.

[50] See Proposal for a Regulation of the European Parliament and of the Council on Packaging and Packaging Waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC, COM(2022) 677 final, 2022/0396 (COD) (30 November 2022). https://environment.ec.europa.eu/system/files/2022-11/Proposal%20for%20a%20Regulation%20on%20packaging%20and%20packaging%20waste.pdf. See also para. 1.5.1 and arts. 11, 12, 13, 56.1.c of the Proposal for a Regulation on Packaging and Packaging Waste.

[51] Commission Recommendation (EU) 2021/2279 of 15 December 2021 on the Use of the Environmental Footprint Methods to Measure and Communicate the Life Cycle Environmental Performance of Products and Organizations, OJ L 471 (30 December 2021).

[52] European Commission, Product Environmental Footprint Pilot Guidance: Guidance for the Implementation of the EU Product Environmental Footprint (PEF) during the Environmental Footprint (EF) pilot phase, version 5.2 (European Commission, February 2016). https://ec.europa.eu/environment/eussd/smgp/pdf/Guidance_products.pdf.

[53] See, for example, European Commission, Product Environmental Footprint Category 2 Rules Guidance 3, version 6.3 (European Commission, May 2018). https://ec.europa.eu/environment/eussd/smgp/pdf/PEFCR_guidance_v6.3.pdf.

[54] See FoodDrink Europe, www.fooddrinkeurope.eu/wp-content/uploads/2022/09/FoodDrinkEurope-Guidelines-on-Product-Environmental-Footprints.pdf.

[55] Compare with articles 9, 30, 34, and 35 of annex I, Regulation (EU) No. 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the Provision of Food Information to Consumers, Amending Regulations (EC) No. 1924/2006 and (EC) No. 1925/2006 of the European Parliament and of the Council, OJ L 304 (22 November 2011).

[56] Its relevance was such that since 2021 it has also been included as a neologism in the Cambridge Dictionary, as 'ranking the environmental impact of each item and allowing customers to easily assess whether they are buying goods that have a low-carbon footprint from suppliers focused on sustainability'. See Cambridge Dictionary, https://dictionaryblog.cambridge.org/2021/08/16/new-words-16-august-2021.

been partly revised with the new proposal for a different labelling system called 'Planet-score'.[57] This is an improved mechanism that takes into account additional indicators including values such as biodiversity, climate, and pesticides.[58] This model fits into a pathway towards achieving sustainable greenhouse gas emission levels that commenced in 2009 with statutory law Grenelle I,[59] was subsequently strengthened via statutory law Grenelle II,[60] and which was completed via statutes on energy transition for green growth,[61] the circular economy,[62] and climate change and resilience.[63]

16.4 Conclusion

While environmental labelling was initially designed merely for the purposes of environmental cleanliness, based on the idea of waste prevention,[64] international regulation is now widening its scope of application with a particular view to spanning greenhouse gas emissions This particularly entails an extension of ecolabelling from non-food to food products, as the food production sector – particularly agriculture – is responsible in itself for one-third of global greenhouse gas emissions. Although the EU Ecolabel Scheme still embraces a restrictive notion of ecolabelling, in the light of evolving regulation in countries such as France, environmental labelling is desirable. It is therefore likely that the EU will *de lege ferenda* move to an extensive ecolabelling approach, covering both non-food and food products, thereby in part fulfilling the objectives of the Paris Agreement, the UN Agenda 2030 for Sustainable Development and the European Green Deal. In such an evolving framework, it is important to avoid over-information via targeted policies, providing correct consumer information and guaranteeing fair treatment.

[57] S. Itab, Futur Etiquetage Environnemental: le Planet-score prochainement affiché sur les produits alimentaires grâce au soutien de la société civile et à la mobilisation d'entreprises désireuses d'accélérer la transition écologique (Very Good Future, 2021), p. 4. http://itab.asso.fr/downloads/affichage-environnemental/itab_sayari_vgf_-_communique_planet-score_-_20211028_vz.pdf.

[58] See L. Brimont, M. Saujot, Affichage environnemental alimentaire: révéler les visions pour construire un compromise politique (Iddri, October 2021), p. 92. www.iddri.org/sites/default/files/PDF/Publications/Catalogue%20Iddri/Etude/202110-ST0821-AE_1.pdf.

[59] Loi de programmation relative à la mise en œuvre du Grenelle de l'environnement, No. 2009-967, 3 August 2009 (J.O. 5 of August 2009).

[60] Loi portant engagement national pour l'environnement, No. 2010-788, 12 July 2010 (J.O. of 13 July 2010).

[61] Loi de la transition énergétique pour une croissance verte, No. 2015-992 of 17 August 2015 (J.O. del 18 agosto 2015).

[62] Loi relative à la lutte contre le gaspillage et à l'économie circulaire, No. 2020-105 of 10 February 2020 (J.O. of 11 February 2020).

[63] Loi portant lutte contre le dérèglement climatique et renforcement de la résilience face à ses effets, No. 2021-1104 of 22 August 2021 (J.O. of 24 August 2021).

[64] Indeed, in 1987, the European Economic Community (as it was then) proposed a European label for clean products, which in 1992 resulted in the Community Label award scheme via Resolution of the European Parliament on Waste Disposal Industry and Old Waste Dumps of 19 June 1987, OJ No. C 190 (20 July 1987).