

THE EU ENVIRONMENTAL FOOTPRINT METHODOLOGY

What can it deliver and what not?



EEB

European
Environmental
Bureau

PRODUCT ENVIRONMENTAL FOOTPRINTS

A viewpoint from environmental NGOs

- WHO WE ARE AND WHAT ISSUES WE WORK ON
- CAN WE BUILD ON THE RESULTS OF THE PILOT PHASE?
- HOW RELEVANT AND RELIABLE ARE THE CHOSEN IMPACT CATEGORIES?
- WHICH TYPE OF APPLICATIONS OF PEF COULD WE IMAGINE/ SUPPORT?
- RECOMMENDATIONS FOR IMPROVING THE USEFULNESS OF THE PEF TOOL

WHO WE ARE

The European Environmental Bureau

Europe's largest network of environmental citizens' organisations

- around **140 civil society organisations...**
including a growing number of other **European networks**
- ...from more than **30 European countries**

Over 40 years of EU environmental policy expertise

WHAT ISSUES DO WE WORK ON

www.EEB.org/work-areas/

The EEB tackles **Europe's most pressing environmental problems** by agenda setting, monitoring, advising on and influencing the way the EU deals with these issues.

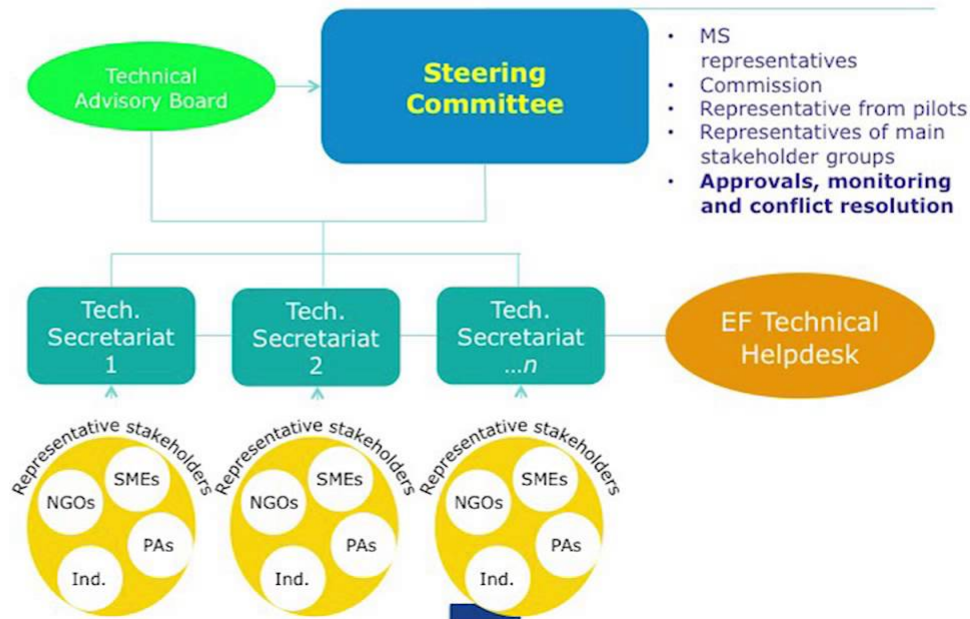
Our areas of work include:

- **Climate and Energy**
- **Nature and Sustainable Agriculture**
- **Industry, Chemicals and Health**
- **Resource Efficiency and Circular Economy**
- **Sustainability and Governance**
- **Global and Regional Policies**

We also lead on overarching issues as sustainable development, good governance, participatory democracy and the rule of law in Europe and beyond.

CAN WE BUILD ON THE EF PILOT PHASE?

- Bottom up process – Voluntary participation **but what about the product categories not being covered?**
- Harmonised data sets, streamlined rules for LCA modelling, agreements on horizontal & sector rules **but inconsistencies remain?**
- 23 PEFCRs have been scrutinized **but how do they look on real products?**



- **We have not overcome the black box**, mainly LCA and industry experts but only a few civil society groups involved in the development of PEFCRs
- **Verification procedure to be clarified, Communication rules not agreed**

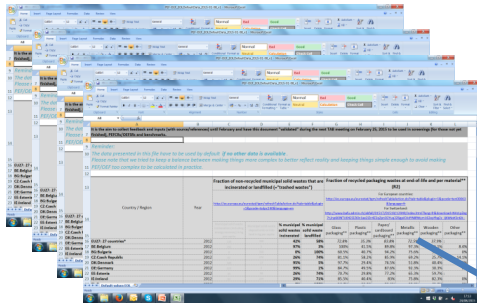
HOW RELEVANT AND RELIABLE ARE THE CHOSEN PEF IMPACT CATEGORIES?



- For the majority of products, impact categories related to climate change, natural resources/ land use and toxicity will be dominating their environmental profile.
- Excluding human toxicity and eco-toxicity from being used for communication vehicles based on PEF will give a biased picture on the environmental profile for many product groups
- Impacts on biodiversity and ecosystem functions are not part of the EF guidance in a state-of-the-art, LCA compatible methodology, and the options to report on additional environmental information are not used by the pilots
- The so called Circular Footprint Formula addresses the uptake of reused and recycled content plus diverse end-of-life options but does not allow for comparison of different use phase scenarios

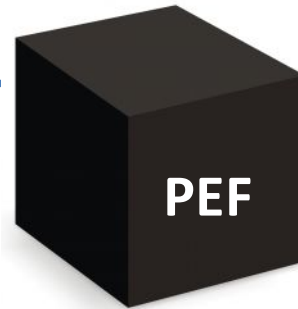


WHICH TYPE OF APPLICATIONS OF PEF COULD WE IMAGINE/ SUPPORT?



A new analytical method to substantiate policy measures?

Stop proliferation of green marketing claims?



Information for consumers to influence their purchasing choice?



A CONTRIBUTION TO THE ANALYTICAL FRAMEWORK FOR EU PRODUCT POLICIES

- PEF can help identifying and quantifying relevant environmental impacts beyond GHG emissions.
- It can improve comparability for some but not all relevant aspects. It is not clear if a single, aggregated PEF score will allow for sufficient differentiation between products.
- We need to distinguish between aspects directly related to the product properties and impacts associated to the place of production or consumption or disposal.
- PEF needs to be complemented by other tools and standards because LCA methods alone do not deliver robust, verifiable and enforceable thresholds.
- It could be used as a cross-checking and optimisation tool to avoid or mitigate environmental trade-offs.



A VERIFICATION TOOL FOR CHECKING GREEN MARKETING CLAIMS



- Many companies already use LCA to substantiate the environmental benefits of the product innovations that they offer, others do not. All define the scope and methods of their studies on their own.
- Robustness of claims by producers should be verified through PEFCRs that look at the overall environmental profile of a product instead of focusing only on isolated aspects or impact categories that show positive results.
- In order to be fit for purpose, PEFCRs must continuously be reviewed and updated so that they can incorporate new environmental challenges or societal needs.
- It would incentivize environmental optimisation of products not only on isolated aspects but in a more comprehensive way.

RELEVANT FOR B2B & B2C INFORMATION?

- PEF should be used as a B2B data vehicle along the supply chain to facilitate exchange & collaboration on information sharing and improvement options.
- PEF could become a building block for a harmonized and sector-wide Environmental Product Declaration (EPD) or Digital Product Passport scheme that ensures comparability & quality of the data provided.
- Ambitious tenders for Green Public Procurement (GPP) may require a PEF study as a means of verification for an environmental profile above the average market benchmark.
- PEF could support criteria setting in Type 1 Ecolabels but performance classes exclusively based on LCA impact categories would not be sufficient.
- Labels of environmental excellence require distinct product features that can be easily understood by the consumer and 'translated' into clear benefits that separates them from other, non-labelled products.



RECOMMENDATIONS FOR IMPROVING THE USEFULNESS OF THE PEF TOOLBOX

1. Focus on its key function as internal improvement tool and instrument to avoid or mitigate trade-offs between different environmental impacts
2. Make sure that all relevant environmental impact categories such as toxicity and biodiversity can be captured thoroughly
3. Allow for complementary information beyond LCA data such as relevant sector standards or certification schemes
4. Utilize tools like Exiobase for PEF that combine economic input-output analysis with environmental data to map impacts from global supply chains
5. It would help to identify the most relevant product categories that should be covered by EU Product Policies as a priority
6. Investigate how PEF related information could be combined with Type 1 multi-criteria Ecolabels but abstain from creating a graded PEF label that would confuse consumers

YOUR CONTACT AT THE EEB



Carsten Wachholz
Senior Policy Officer
Resource Conservation &
Product Policy

carsten.wachholz@eeb.org



<http://eeb.org/work-areas/resource-efficiency/product-policy/>

@Green_Europe



With the support of the
LIFE Programme of the
European Union