

## Product Environmental Footprint (PEF): State of play at EU level in brief – 28/09/2016

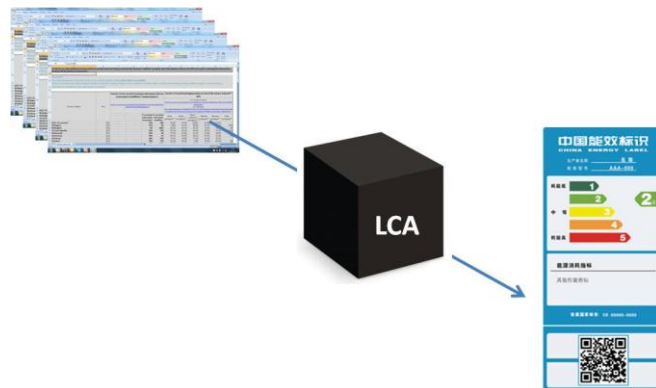
### What is it about?



The EU pilot phase on PEF develops rules to generate information on the environmental impact for different product categories, based on a set of harmonized methods for carrying out a Life Cycle Assessment (LCA) study. It aims at identifying the most relevant environmental impact categories and activities along the life cycle for a respective product category. Only those will be taken into account for the final (aggregated) assessment. PEF could allow the European Commission, public authorities and the private sector to assess, display and benchmark the environmental profile of products. It should prevent consumers from being misled by false green marketing claims and help them to choose environmentally superior products.

### How does it work?

- We need to agree on how to integrate lots of different data sources on environmental impacts related to defined product properties and performances with varying quality and reliability.
- We need to document all steps in the calculation of the environmental profile in a transparent way and based on Product Category Rules (PEFCRs), so that you cannot simply choose the approach by which your products look best.
- We might end up with a highly aggregated measurement of PEF performance classes.
- 24 different PEFCRs are currently being developed and tested during a three years pilot phase which is supposed to end in July 2017.



### Who steers and who decides?

There is a dedicated Environmental Footprint team within the Unit B1 Sustainable Production, Products and Consumption at DG Environment of the European Commission who is in charge of structuring and facilitating the process. The EEB is the only representative from civil society organisations actively involved in the Steering Committee (SC) and the Technical Advisory Board (TAB) who officially scrutinize approve the work undertaken during the pilot phase. The Technical Secretariats (TS) of the 24 pilot pro-

jects have an absolute majority of votes in both bodies. As a result, the whole process is dominated by industry representatives and LCA consultants who engage in the development of the different PEFCRs. EU Member States participate as well but only a few of them have the capacity to follow closely the pilot phase and make an informed intervention before it comes to a vote or decision at SC and TAB level.

## Where does the process stand right now?



All pilots carry out the following steps (steps in grey are already completed by all 24 pilots).

Action	Estimated duration of the task	Pilots going for communication market test (6 months)	Pilots going for online and/or focus group tests (2-3 months)
Supporting studies (sent to the EC)	3 months	22nd April 2016	3rd July 2016
Verification		9th September 2016	9th September 2016
Public consultation	1.5 month	9th September 2016	
Communication	2-6 months	25th November 2016	
PEFCR/OEFSR Review	2 months	25th November 2016	
Final PEFCR (sent to the EC)	1 month	21st December 2016 (fixed deadline)	
Remodelling exercise		Est. between October 2016 - April 2017	
PEFCR submitted to Steering Committee		End of May 2017 (fixed deadline)	
Steering Committee meetings and final approval		End of May and End of June 2017 (tbc)	

## Why does the EEB work on PEF?

- The EEB advocates for a better alignment of the different strands of EU Product Policy such as Ecodesign, Energy-labelling, GPP and Ecolabel as well as with sector-specific legislation such as the EU Construction Products Regulation (CPR). All these policies are based on some sort of LCA studies. Thus, PEF could help harmonizing the scientific analysis used for Product Policies in the EU when dealing with the same or comparable product categories.

- The proliferation of green marketing claims that cannot be substantiated confuses consumers. Therefore, the EEB supported the aims of the EC communication on “Building the single market for green products” in 2013 that laid the foundation for testing the PEF methodology during a three years pilot phase. However, the EEB is also convinced that a PEF profile needs to be complemented by additional analysis in order to choose the right policy tools and to provide meaningful information to consumers.

## How has the EEB been engaged so far?

### Since 2012

The EEB followed the EU initiative on PEF from its very beginning: We were particularly supportive of the focus on identifying environmental hotspots over a product’s life cycle and on fighting false green claims. At the same time we criticized that no clear political objectives were defined for the development, testing and eventual utilization of the methodology.

### 2014

Since May Carsten Wachholz has represented the EEB both in SC and TAB meetings as other priorities and capacities allowed. In October WWF International and EEB requested the Commission to consider the [integration of performance-based standards & best practice certifications for biodiversity and ecosystem](#) related impacts into the PEF profile. In December the EEB submitted a proposal to the Commission and other stakeholders for a midterm debate on the pilot phase to discuss the [role of PEF for product policy, communication to end users and stopping the proliferation of green claims](#), highlighting the potentials & constraints of LCA methods as well as the need for complementing approaches.

### 2015

From February to May EEB contributed with help of WWF International and the PEF Helpdesk to develop a [TAB issue paper](#) on addressing biodiversity in the Environmental Footprint pilots which has to be implemented now by all pilots. In September and November the EEB presented its [views on future policy options for PEF to achieve a more transparent European market for greener products](#): during the Environmental Footprint Seminar of the Nordic Countries in Stockholm and the EU midterm conference on the PEF/OEF pilot phase in Brussels. Since October the European Commission granted a service contract worth of 20 working days per year that allowed us to contract Kim Christiansen as our EEB expert working on PEF. We used Kim’s expertise to engage in particular on horizontal methodological issues such as normalizing and weighting, performance classes and the end-of-life formula to be used in all PEF studies.

### 2016

In March the EEB, together with WWF International, conducted a scan of all draft PEFCRs on the [status of implementation of the TAB issue paper on addressing biodiversity impacts](#). The results were presented both at TAB level and at a working group meeting of the Roundtable on Sustainable Food in April & May. Our input to the public consultations of the final draft PEFCRs during the summer focused on three selected product groups: t-shirts as a representative for the textile sector, detergents for the chemicals sector and rechargeable batteries for electronics.

## What is our interim assessment on the methodological approach?

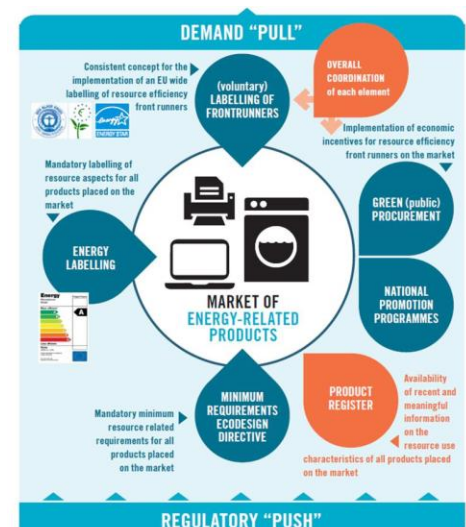
- PEF is not per se better or worse than any other LCA methodology. But it is less flexible to capture all relevant environmental impacts because many methodological choices are predefined by the Commission in order to achieve better comparability of PEF compliant studies for a specific product.
- The list of 15 PEF impact categories including related indicators is compulsory and exclusive to be used in any PEF compliant environmental assessment study. The quantified environmental profile of a specific product will be based only on the selected indicators and for those life cycle activities that show the relatively highest environmental impact. Although additional (qualitative) information may be given in an extra chapter.
- The Commission provided extensive tables containing normalisation factors that should allow identifying the most relevant impact categories of specific product category during the initial screening phase of a PEF study. Unfortunately, the results were not reliable for a number of pilots because toxicity outweighed other impacts by far, even where common sense tells us a different picture.
- While prescribed PEF standard methodologies to measure impacts e.g. on climate change, ozone depletion, particulate matter, acidification and eutrophication are well established and tested in other LCA studies, the chosen model/ tool for characterizing human and ecotoxicological impacts of chemicals in PEF studies (<http://www.usetox.org/>) has not been proven delivering reliable results and has therefore being challenged by a some pilots (e.g. on detergents).
- Other PEF indicators on land, water and resource use have been criticized because they do not capture all relevant environmental impacts, in particular on ecosystems and biodiversity. Therefore, WWF International and EEB have pushed e.g. for testing additional methods to be included in future PEF studies.
- It remains unclear how PEFCRs will be developed for product groups that are not covered in the current pilot phase. Given all the remaining uncertainties and the need for continuous improvement of the PEF methodology, PEFCRs would need to be updated on a regular basis to deliver meaningful and up to date product assessments.
- **As an analytical LCA tool, PEF has some shortcomings which could be overcome in the future. But at this stage, the EEB does not consider PEF as a ready to be used tool for communicating environmental information on products to consumers.**

## Which policy options could be envisioned for the application of PEF in the future?

Overall we think that PEF could help us create some analytical consistency between different policy instruments but will not replace any of the existing tools.

### Some examples:

Through the EU Ecodesign Framework and/ or other sector legislation, we could address additional environmental impacts than just carbon emissions related to energy consumption. PEF would help with prioritizing issues but not with defining the appropri-



ate type of necessary minimum requirements on product design. In the same way, we could also aim at gradually integrating additional environmental information that is reliable, clear and simple into the EU Energy label scheme or Environmental Product Declarations, either as separated categories or by aggregated ratings.

On the other hand, we are convinced that effective communication tools on the environmental performance of products and services must enable plain comparisons which are meaningful and understandable for consumers. This is certainly not the case for the calculated scores of different PEF indicators. Therefore, the PEF profile needs to be complemented by criteria that are based on real performance which e.g. can be measured and verified directly on the product or through a chain-of-custody approach. This would also allow us to identify the real environmental frontrunners which can then be awarded e.g. by type 1 multi-criteria ecolabels for their excellence.

## Short outlook: What needs to be further worked on?

- Make the results of the supporting studies in the pilot phase or of any other PEF compliant studies publicly available, including the comments from the external reviewers. PEFCRs are by far too abstract to understand which results they would deliver for a real product.
- Compare PEF studies with other LCA studies for the same product category and identify strengths or weaknesses. Decide on how to deal with impact categories for which predefined PEF indicators do not deliver sufficient or reliable results. Allow for complementary approaches to cover the full environmental profile.
- Investigate innovative methods to develop a PEF compatible, standardized assessment inter alia on resource consumption, on biodiversity and ecosystems impacts, as well as on toxicity.
- Any strange or confusing effects of normalisation and weighting must be evaluated with care.
- Check if PEF delivers meaningful information for food products if data from relevant parts of the supply chain is missing or incomplete. Integrate information from certified agriculture or forestry management systems into PEF.
- Abstain from introducing a distinct PEF label for consumers. Rather check how PEF compliant studies can be used to improve existing policy and communication instruments so that green marketing claims must be verified in a robust manner.

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