

Product Environmental Footprint and its place in EU product policy

Introduction

The European non-ferrous metals industry produces and recycles strategic and valuable metals for transport, buildings, packaging, electronics, batteries and other applications.

As of 2013, Eurometaux and Euromines were actively engaged in the European Commission's Environmental Footprint Pilot Phase by developing the '*Product Environmental Footprint Category Rules (PEFCR) for Metal Sheets in Various Applications*'. We are also looking forward to being an active stakeholder during the so-called EF Transition Phase (2018 – 2021); a process that will focus on improving the EF methodology and defining its place in the EU's product policy, as well as offering the possibility to create category rules for new products/organisations.

This paper presents our position on the methodology aspects that should be looked at in detail during the EF Transition Phase: data quality, and the integration of EF in the EU Product Policy Framework.

Key recommendations

- **Further refinement of Environmental Footprint (EF) methodology** – The Commission should work with stakeholders to revise shortcomings defined during the Pilot Phase to make sure that the methodology is robust.
- **No standalone EF tool/label** – The EF methodology should complement existing tools after essential developments and corrections are made. Benchmarking and comparison of products should remain voluntary and industry-led.

Environmental Footprint Methodology

Current methodologies to assess products are based upon existing life cycle assessment standards or on recently developed methodologies, and cover a variety of environmental impact categories. In order to make products comparable and to encourage companies to develop improvements, a workable and harmonised approach as well as specific product category rules are necessary.

The Environmental Footprint methodology improves current LCA methods by integrating data quality requirements and rules that improve consistency. It also requires a cradle-to-grave approach, which includes the End-of-Life (EoL) stage. The development of Product Environmental Footprint Category Rules and guidance contributes to increased reproducibility and consistency of results.

To date, some impact categories like Human Health Toxicity, Ecotoxicity and Abiotic Resources Depletion (ADP) have been removed from the EF impact categories considered in the analysis of the most relevant processes (previously called the hot spot analysis), in comparison of products and in communication. The main reasons behind this decision were their underlying model shortcomings and significant uncertainty of results.

The ADP_[Reserve Base] has been a particular challenge. During the EF Pilot Phase it has been decided that it will be temporarily replaced by ADP_[crustal content]. Moreover, a need has been confirmed from the metals industry side and formally addressed to the Commission to develop a better alternative in the coming years. We hope that the project to explore in depth the JRC's proposed dissipation method in LCIA can go forward with involvement of European Commission and the industry.

Our recommendation: EF methodology needs to be further developed before it can be used for decision making. Specific focus should be given to improvements to toxicity, ecotoxicity and resource use.

Data quality

Along the process of preparing the PEFCR for Metal Sheets our industries were challenged with fundamental problems with respect to datasets. The biggest one was a double application of the Circular Footprint Formula (CFF). This had a clear impact on the analysis of the most important processes (previously called the hot spot analysis).

The EF methodology stresses the need to use high-quality data for Life Cycle Assessment (LCA) and includes guidelines to assess the quality of the data as well as its correctness. Data quality and its adequate verification will increase awareness of the more important impact categories and will improve the robustness of environmental claims. This is key in respect to already available datasets and the future ones that will be required for new PEFCRs/OEFSRs.

Our recommendation: The European Commission should ensure that sound and robust data is available for EF users, by improving the EU datasets. These should comply with high quality data requirements, and represent the state-of-the-art knowledge of industrial processes.

Potential application of EF method in existing product policy

A thorough strategic reflection is needed on how to align the EF methodology with the EU's other methods and initiatives for measuring the environmental impact and green claims. We see this as an opportunity to streamline and optimise the EU's Product Policy Framework instead of expanding it. Elements of the EF methodology could potentially be integrated in existing policy. An analysis of policies and tools, including Eco-Management and Audit Scheme (EMAS), Green Public Procurement (GPP), Ecolabel or ecodesign would be necessary.



For construction products, the Environmental Product Declarations (EPDs) show the environmental performance based on LCA. Within the standard EN15804 on EPDs the process is streamlined and it supports the best practice within the building sector. However, further alignment is needed between PEF and CEN TC350 standards (including EN15804) before they can be used in policy to grant a recognition of European EPDs in all Member States.

Our recommendation: Benchmarking and comparison of products should remain voluntary and industry-led. EF methodology should complement and validate existing life cycle assessment tools after essential developments and corrections are made.

Potential application of EF method in future policy

We are also aware that the European Commission is evaluating the potential of including EF methods to support the implementation of future policy initiatives; for example the Action Plan on Sustainable Finance and its taxonomy part.

There is a potential for EF methodologies to be used in future policies on products and their lifecycle assessment. In each situation, the European Commission should undertake a thorough evaluation with all stakeholders to determine the appropriateness of implementing EF methodologies or not.

We regard EF methodologies not as a single method but more as part of a tool-box leading to a more thorough understanding of policy impacts.

In case of Sustainable Finance taxonomy, the Commission is considering EF methodologies specifically for assessing the lifecycle carbon footprint of “manufacture of other low carbon technologies”. An evaluation is now needed on whether EF methodologies fulfil this purpose in complement to existing standards on the carbon footprint of products.

Our recommendation: Before including the EF methodology in any future policy initiative, the Commission should make a thorough evaluation of its added value and appropriateness, involving all relevant stakeholders.

ABOUT EUROMETAUX

Eurometaux is the decisive voice of non-ferrous metals producers and recyclers in Europe. With an annual turnover of €120bn, our members represent an essential industry for European society that businesses in almost every sector depend on. Together, we are leading Europe towards a more circular future through the endlessly recyclable potential of metals.

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ABOUT EUROMINES

Euromines is the recognised representative of the European metals and minerals mining industry. It represents large and small companies and subsidiaries in Europe and in other parts of the world which provide jobs to more than 350,000 people. The association's main objective is to promote the industry and to maintain its relations with European institutions at all levels.

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