



NOTE FOR THE ATTENTION OF PEFCR PUBLIC CONSULTATION COMMENTATORS

Subject: Good practices in the frame of the PEFCRs public consultations

To make sure that your comments can be taken into account, please provide constructive comments, with proposed changes or an information source to support them. The paragraph below provides further information on the PEF method, the PEFCR development process, and the goals of the public consultation.

Context – PEF and PEFCR development

The Product Environmental Footprint (PEF) is a life cycle assessment (LCA) based method to quantify the environmental impacts of products (goods or services). It builds on existing approaches and international standards. The overarching purpose of PEF information is to enable to reduce the environmental impacts of goods and services taking into account supply chain activities (from extraction of raw materials, through production and use and to final waste management). This purpose is achieved through the provision of detailed requirements for modelling the environmental impacts of the flows of material/energy and the emissions and waste streams associated with a product throughout its life cycle. The rules provided in the PEF method enable to conduct PEF studies that are more reproducible, comparable and verifiable, compared to existing alternative approaches. However, comparability is only possible if the results are based on the same Product Environmental Footprint Category Rules (PEFCR). PEFCRs provide specific requirements for calculating the products' life cycle potential environmental impacts, and complement and further specify the requirements for PEF studies.

The primary objective of a PEFCR is to fix a consistent and specific set of rules to calculate the relevant environmental information of products belonging to the product category in scope. An important objective is to focus on what matters most for a specific product category to make PEF studies easier, faster and less costly. An equally important objective is to enable comparisons and comparative assertions in all cases where this is feasible, relevant and appropriate. Comparisons and comparative assertions are allowed only if PEF studies are conducted in compliance with a PEFCR. A PEF study shall be conducted in compliance with a PEFCR, if a PEFCR is available for the product in scope. Requirements for the development of PEFCRs are specified in Annex A to the PEF method¹. A PEFCR may further specify requirements made in the PEF method and add new requirements where the PEF method leaves more than one choice. The objective is to ensure that PEFCRs are developed according to the PEF method and that they

¹ https://eplca.jrc.ec.europa.eu/permalink/PEF_method.pdf

provide the specifications needed to achieve the comparability, increased reproducibility, consistency, relevance, focus and efficiency of PEF studies. Rules similar to PEFCRs exist in standards for other types of life cycle based product claims, such as ISO 14025:2006 (type III environmental declarations). Those were not seen as sufficiently stringent and clear to achieve the required objectives of PEF studies based on category rules. PEFCRs were named differently to prevent confusion with other similar rules and to uniquely identify rules under the PEF method. PEFCRs should, to the extent possible, and recognising the different application contexts, be in conformity with existing relevant international Product Category Rules (PCR). If other PCRs are available from other schemes, these are to be listed and evaluated. They may be used as a basis for developing a PEFCR, in line with the requirements provided in Annex A.

Consultation purpose

The objective of the consultation is to take advantage of the public knowledge on the topic and improve the existing documents. A consultation is a formal process of collecting input and views from stakeholders. Views, practical experience and data will help deliver higher quality and more credible PEFCRs. It also ensures greater transparency and legitimacy of the PEFCR development process and contributes to a more successful PEFCR implementation.

The first consultation takes place after the first draft has been created, but before the supporting studies that test the implementability of the PEFCR are carried out. The open consultations are part of the iterative improvement of the PEFCR via the Technical Secretariat work and the exchange between stakeholders, LCA practitioners and sectors experts. It is not a political document but a technical document.

The consultation aims to ensure that all relevant aspects are taken into account in the PEFCR, including data and assumptions made. The questions that you can answer (but are not limited to) are:

- Are the existing product category rules taken into account or identified?
- Are the data quality requirements too high or too low?
- Are the data needs identified realistic?
- Are the requirements enough to perform a replicable PEF study?
- Does the PEFCR follow the requirements listed in the EF method on agriculture modelling, electricity modelling, emissions modelling? Averages? If no which ones and why?

Comments have to be constructive. If you disagree with assumptions or values, please provide justifications, sources or possible improvements. Comments also have to consider LCA/PEF strengths and limitations.

The TS shall provide written answers to each comment received during the public consultation. The replies shall be provided in the same Excel file, which shall be made available to the public in the corresponding wiki page.

DG ENV EF team.