



## Some comments on the Final report on the Evaluation of Environmental Product Declaration Schemes.

Prepared for the EEB by Eva Eiderström, February 2003  
The Swedish Society for Nature Conservation

The EEB would like to thank the Commission for being invited to comment on the final report on the Evaluation of Environmental Product Declaration Schemes, September 2002.

The conclusions of the Commission report:

1. EPDs have started to become an accepted communication tool for environmental information on the European market as well as on international markets.
2. EPDs are still at the beginning of their development and several initiatives could be undertaken to improve their further growth, including improving the harmonisation of EPD schemes, stimulating the supply side by improved access to good quality LCA data and stimulating the demand side by strengthening the link between public procurement and EPDs.
3. It is important to note that these activities should be developed in combination since the future expansion of EPS depends on success in all three areas.
4. The European Commission is well placed to play a role in the further development of EPDs in Europe as has been outlined above.
5. This involvement of the Commission would not only stimulate the increased use of EPDs themselves but would also allow for a stronger integration of EPDs with other IPP tools, and as a result would strengthen the IPP concept itself.

We participated in the Expert workshop where a draft report was discussed and we would like to forward some comments after reading the conclusions of the final report.

1. **The report content does not support the first conclusion that EPDs are an accepted tool.** Neither did the experts present at the expert workshop. There exists a large number of declaration schemes, but for the information contained to be accepted and demanded there also have to exist a recipient. The impression from the workshop was that this recipient is missing and a question posed in the workshop was **what the goal of the environmental report is. Without this clearly defined, the need for the declaration will remain weak** or non-existent. One exception was presented from the Dutch building sector where there were regulations in place or anticipated which demanded compliance from builders and hence these demanded proof of compliance from suppliers which can be delivered in the shape of declarations.
2. The conclusion on strengthening demand side is illogical without a clear definition of what the aim of such EPDs is. Declarations are not a goal in themselves, if they have a meaning this should be as a means to achieving defined goals. In order to be goal-oriented there has to be a framework which defines the relation between the product presented in the declaration and the goals. We know from Swedish studies that the mere existence of a

declaration is perceived, by some, to be a sign of excellence. **Without means of relating the data in the declaration to goals, benchmarks or legislative boundaries/targets the declaration becomes a theoretical exercise without use for anyone.**

3. The conclusion on demand for EPDs also suggests that an expansion will come about by enabling access to **good quality LCA data**. We want to caution the Commission that if products are to be compared on the bases of LCA data, the LCAs have to be performed individually for the products and they cannot be based on general data. **If product declarations are based on average database data**, the results are good only for assessing potential for improvements of the individual product, **not for comparisons between products** (according to the standards of LCA).

The relation between declarations and public procurement is also tricky. Any single product claiming compliance with the demand criteria set up in a call for tender, will have to prove that it complies individually. A declaration based on LCA data accumulated from databases where the data could be everything from industry average to material average will be very far from showing the factual impacts from the product at hand.

4. We agree that the future success of EPDs is dependant on external factors. We would have liked to know what exactly can be achieved by succesful EPDs and question if the Commission isn't neglecting the EPDs obvious problems today. The Swedish system, highlighted in the report, has trouble surviving on its own and is currently not even obtaining government funding for its core activity. **Demand from industry is non existant**. The paper industry which in the beginning was eager to establish something credible to be able **to avoid ecolabelling**, have developed their own system and as the Commission report explains this system is far from being an information tool – it is propaganda. This also should be taken into consideration. **Is there an interest for objective data, comparable data and data showing real environmental impact?**
5. We are **not sure that the Commission will have a role in the development of EPDs unless** the Commission accepts that the strongest driver for their development would be to apply the methodology used with the Dutch building sector to all segments of society. **This implies more regulation**, defined requirements of what is acceptable and what is not, monitoring by authorities, sticks if laggards are reluctant to move in the right direction and above all, clear directions as to where producers should go, both in the short as well as in the long term. Again, as the Dutch example shows, **the threat of regulation** has lead to rapid development, and efforts in the area of complying with upcoming rules, which the EPDs on their own do not lead to.
6. EPDs will be integrated with other policy tools when and if they represent a shortcut, are practical, credible, needed and abundant. Today they in part can be used as means of verifying claims that a product complies with procurement demands but to what extent is unclear due to **the non-comparability in the LCAs used**. Their use for ecolabelling is equally questionable. Labelling criteria tries to encompass aspects regardless of if they can be described in LCA methodology or not. EPDs can only find data in areas where suitable data exist. LCAs cannot describe the future or the past, only the present. EPDs are costly, not particularly exact and are based on methodology which is mostly in the hands of specialists supplied by middlemen. Few producers can conduct them in-house and few

of their customers can decipher them once supplied. **Obviously they will create information overload to most "normal" consumers.** They still have methodological problems to solve in order to be trustworthy. One example was presented at the expert workshop, that of allocation. The steel industry did not include the environmental burden of some of their waste since this was used as an input in the cement industry. The cement industry didn't either since they allocated this burden to the steel industry. Both did the 'correct' thing since there is no consensus of how to do otherwise. **The allocation issue is crucial and deals with the product boundary issues** and is essential for any external credibility of and EPD s data. Such issues would need resolving - **would the COM be able to resolve this by establishing such an allocation framework at an EU level?**