

The role of PEF for product policy, communication to end users and green claims: Potentials & constraints of LCA methods and the need for complementing approaches

Proposal for a midterm debate on the PEF pilot phase

EEB proposal to the European Commission (DG ENV) how to facilitate important discussions on critical issues for the future applicability and enforceability of the PEF methodology according to its potential role as it has been outlined e.g. by the EU Resource Efficiency Roadmap:

- Establish a common methodological approach to enable Member States and the private sector to assess, display and benchmark the environmental performance of products, based on a comprehensive assessment of environmental impacts over the life-cycle ('environmental footprint');
- Ensure better understanding of consumer behaviour and provide better information on the environmental footprints of products, including preventing the use of misleading claims, and refining eco-labelling schemes.

Objectives and proposed solution

- Seize the midterm of the pilot phase as an opportunity to step back and assess the approaches taken so far, without drawing premature conclusions on any future application of PEF
- Facilitate an intermediate debate on the conditions to be met for the possible (anticipatory) utilization of the PEFCRs in product policy, communication and validation of green claims
- Provide further clarity about the scope and possible constraints of the pilot phase
- Identify major need(s) to adapt and/ or to complement the further development of PEFCRs
- Explore meaningful lessons learned from existing approaches, tools and instruments and prepare for further challenges both for refining PEFCRs and testing of communication vehicles
- Increase ownership by the SCP/IPP working group and the broader community working on sustainable production and consumption regarding development and possible utilization of PEFCRs in the future

The EC should set up a special meeting or separate workshop of the SCP/IPP group in e.g. June or September 2015. If needed the scope of stakeholders should be extended according to the objectives. Regarding timing: First drafts of PEFCRs and plans for testing communication vehicles from several pilots should already be available as practical examples for the discussion.

Issues at stake

- **How can we constructively engage with critics from stakeholders who are not actively participating in the pilot phase but have raised important concerns in terms of uncertainty and inherent limitations of the methods proposed by the PEF approach of the European Commission?**
There are numerous of subjective assumptions and value choices to be resolved when applying recommendations, formula, normalisation and weighting factors within the PEF methodology which need to be transparent and consistent between the different pilots as well as informed by policy objectives and priorities. This cannot be decided by LCA experts and industry representatives alone but belongs to the level of policy decision.
- **How can a PEF profile derived from the methodologies developed during the pilots contribute to comparative assertion of the environmental performance of a product? Do we need additional information and tools, in particular if used for consumer communication? How can we best fill the gap between type 1 Ecolabels for identifying the best performing products and minimum requirements for banning the worst products?**
Innovative LCA-applicable approaches and existing "performance-based indicators" need to be explored and be taken into account to fill the gaps of the current PEF methodology, e.g. regarding appropriate impact assessment tools for biodiversity and ecosystem services as well as to recognize and to reward leadership in responsible sourcing and sustainable management of different commodities.
- **How can the PEF pilot phase stimulate companies to make best use of and further improve LCA methods while incorporating (emerging) societal concerns and (new or urgent) environmental challenges?**
The possible links between PEFCR and the need for validation of green claims should be further explored, notably to anticipate how PEFCR could increase the robustness of claims by producers. This has to take into account changing perceptions of environmental challenges and societal needs.

Draft outline of a workshop concept (1 day)

1. Introduction and state of play of the EF pilot phase by the European Commission

2. Breakout sessions on main expectations and concerns of different stakeholder groups

Different stakeholder groups discuss their 5 main expectations and/or concerns regarding possible outcomes of the pilot phase and future applicability of PEFCRs in product policy and communication

Separated round tables for representatives e.g. from Member States (Policy/ Ministerial level), Manufacturers (Large companies, SMEs, Industry/ sectoral associations), Consumer Organisations, Environmental Agencies and NGOs, LCA experts (i.e. 5 different interest groups, can be extended)

- Self facilitated prioritisation within each interest group
- Presentation of the results of each group to the plenary, Questions & Answers for clarifications
- Identify issues of agreement or disagreement as well as cross-cutting issues to be discussed further

3. Lunch break

Cluster the results reached so far along headlines of e.g. 4 proposed workshop sessions after lunch; Maybe keep open space for one additional workshop session for an unexpected issue which has been considered of high importance during the discussions in the morning plenary.

4. Possible structure for workshop sessions including indicative questions

PEF as a potential marketing tool

How to ensure it contributes effectively to control the veracity of green claims and the fight against green-washing?

PEF as a potential tool of analysis for product policy

What is needed to generate added value compared to existing tools (e.g. used for Ecodesign, GPP, Ecolabelling) and how can it contribute to a more consistent application across different policies?

PEF as potential tool for consumer information

How can PEF help providing environmental information on mass-market products?

Which lessons can be learned from existing instruments for delivering relevant information to consumers?

Open space for an additional workshop session

5. Summary of key recommendations for the continuation of the PEF pilot phase

To be done by the facilitators of the workshop sessions in plenary;

Optional: To be followed up by a panel discussion with representatives from the different stakeholder groups

6. Wrap up of the Workshop:

Possible follow up actions by the European Commission

Concluding remark

The key question of enforceability and verifiability of the information communicated and the ownership by concerned stakeholders beyond the PEF/LCA community (e.g. retailers, consumer groups, surveillance authorities) need to be addressed seriously if we want the PEF scheme becoming a success story.