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QUESTIONS ABOUT THE PRODUCT ENVIRONMENTAL FOOTPRINT (PEF) AND ORGANISATION ENVIRONMENTAL FOOTPRINT (OEF) METHODS

Are the PEF and OEF methods completely new approaches?

No. They have been developed based on existing, well-established, tested and widely used methods, standards and guidelines, such as the International Life Cycle Reference Database Handbook, ISO 14040-44, ISO 14064, PAS 2050, BP X30, WRI/WBCSD GHG protocol, Sustainability Consortium approach, ISO 14025, Ecological Footprint, Global Reporting Initiative, WRI GHG Protocol, CDP Water Footprint, DEFRA guidance on GHG reporting, ADEME Bilan Carbone and others.

Why was there a need to develop the PEF and OEF methods?

There is a proliferation of methods for measuring the environmental performance of products and organisations. Considering the area of carbon measurement only, studies carried out by the Commission identified 62 leading initiatives and methods on product carbon footprinting and 80 on carbon reporting (status in 2010)¹. Some Member States are considering voluntary or mandatory policies based on life cycle assessment; private initiatives are coming up with multi-criteria methods for measuring life cycle environmental performance. Other than creating confusion on the market, the proliferation of methods also leads to additional costs for companies trading across borders: they might need to measure their performance according to several, diverging methods.

Methods are generally diverging on several issues or leave some methodological choices open for the user. This means that it is not possible to compare the results of measurements using different methods. But neither is comparability of two measurements carried out on the basis of the same method guaranteed due to the built-in flexibilities; and even comparability regarding the year-on-year performances of a company depends on the consistency with which methodological choices were done.

If consumers find environmental figures on products, they automatically tend to compare them. However, today this comparison is misleading, as explained above. The PEF and OEF methods reduce methodological choices already at the level of the general method. Product category and sector-specific rules will furthermore be developed with the goal of enabling comparison of environmental performances between similar products and companies active in similar sectors.

The PEF and OEF methods are based on Life Cycle Assessment (LCA). What is LCA?

LCA is defined as the “*compilation and evaluation of the inputs, outputs and the potential environmental impacts of a product system throughout its life cycle*” (ISO 14040:2006).

¹ *Product Carbon Footprinting – a study on methodologies and initiatives*, (2010); *Company GHG emissions reporting - a study on methods and initiatives* (2010)

The life cycle includes the extraction, transportation, processing, use and disposal (or reuse/ recycling). This includes both direct impacts (e.g. impacts on the production site, impacts of transport vehicles controlled by the company) and indirect impacts (e.g. occurring in the supply chain, at extraction, if these activities are not controlled by the company; occurring in the use stage).

The PEF and OEF methods aim to cover all life cycle stages – however, it is possible that for certain products or organisations some life cycle stages may be excluded, either because the life cycle stage is not relevant for the environmental performance of the product/organisation, or because it is impossible to get representative information (e.g. for intermediate products it is impossible to calculate impacts in the use stage).

Why did the Commission choose LCA as a method for measuring environmental performance?

There are many possible methods for measuring environmental performance, whether of products or organisations.

Some of the methods focus on a single life cycle stage, i.e. environmental impacts directly caused during a specific life cycle stage of the product/organisation, e.g. the hazardous waste resulting from production or tonnes of rare metals used for producing the product.

Other methods include environmental impacts caused during the whole life cycle, i.e. including impacts in other stages of the life cycle, e.g. extraction, logistics, use, end of life. Life Cycle Assessment takes a life cycle perspective. The advantage of this life cycle approach is that it takes a holistic view at the product and at the value chain and avoids possible burden shifting to other life cycle stages. It moreover helps identifying "hotspots" – elements in the life cycle that contribute most to the environmental impact. Thus, organisations can intervene in a strategic way, e.g. through the design of their products to make sure that the hotspots are reduced, obtaining both higher environmental benefit and possibility for higher cost savings. If, for example, only the production stage was looked upon, problems, risks and opportunities upstream and downstream in the value chain would not be detected.

Some methods focus on a single environmental indicator (e.g. water footprint), whilst others take a multi-criteria approach (Ecolabel, Life Cycle Assessment). The advantage of looking at several environmental indicators is that possible burden shifting to other impact categories is avoided. A multi-criteria approach thus allows for correct decision taking: the improvement of one environmental indicator will not result in the deterioration of another.

For example, in the case of an energy-using product, where only energy use during use stage is measured, improvements in energy efficiency (during the use stage) might go hand in hand with an increase in the amount of materials needed to produce the appliance – with all the environmental impacts associated to extraction of materials or resource depletion that the producer will not be aware of. If the producer has full information, he/she can decide on life cycle improvements that balance better between the two (or several) indicators.

LCA covers the whole value chain and it is a multi-criteria method. It is found the best tool currently available for targeting improvements of environmental performance of both products and organisations.

Why is comparability an objective?

One of the differences between the PEF and OEF methods and other leading methods is the fact that it takes methodological choices in order to promote consistency and comparability of results. The main reasons for this are:

- Companies can benchmark their performance within their sector or product category: they can understand how their environmental performance is in comparison to their peers and can better target their improvement efforts;
- Benchmarking is a strong reputational incentive: for many companies, being a good environmental performer is part of their business values and strategy. Product category and sector benchmarks create a drive for strong improvements and have the potential of shifting the performance of the whole sector or product category upwards;
- It enables consumers to take better informed purchasing decisions by comparing the performance of products in the same product category;
- Investors can better target their decisions knowing how companies perform in comparison to peers in their sector – they can better assess the level to which a company deals with relevant environmental impact;
- Governmental actors can better target their incentives: by knowing the performance of beneficiaries within their sector, they can avoid Environmentally Harmful Subsidies and can reinforce action in gap areas; they can provide incentives for sustainable consumption focussing on reliably green alternatives;
- Basis for future policy: reliable, comparable quantification of environmental performance is a pre-condition to any policy that would eventually define minimum environmental performance requirements and for reliably linking economic instruments to environmental performance; furthermore, it makes targeted policy interventions possible to cover weak performance areas.

What indicators do the PEF and OEF method cover?

The PEF and OEF method can potentially cover 14 impact categories: climate change; ozone depletion; human toxicity - cancer effects; human toxicity - non-cancer effects; particulate matter/respiratory inorganics; ionising radiation; photochemical ozone formation; acidification; eutrophication – terrestrial; eutrophication – aquatic; ecotoxicity - freshwater aquatic; land use; resource depletion - water; resource depletion – mineral and fossil fuel.

Do we have to use all 14 impact categories?

No. The method instructs on how to identify relevant impact categories starting from the list of 14 default categories. This is to be done for individual sectors in OEFSRs or

product categories in PEFCRs. The calculation of impacts is not required for the irrelevant impact categories.

In the case of PEF, if the information is used to communicate environmental performance to consumers, a limited number of impact categories could be used (max 3-4) in order to guarantee that consumers can easily grasp the information². However, communication aspects are not part of the PEF and OEF methods.

Why do we need the choice between 14 impact categories?

Relevant impact categories are different for different sectors or product categories. For example, climate change (GHG emissions) is very important for energy-intensive sectors, whilst they are not as important for example for cosmetics– where it would be more the water use and toxicity aspects that define environmental performance.

To take into account 14 impact categories will make it possible to focus on the 3-4 impact categories that define the environmental performance of a product in reality, and focus communication and improvement on those. Furthermore, it helps organisations focus on improving environmental performance where it most matters, and ensures that trade-offs between important impacts are avoided.

There are too many variations in the LCA method leading to unreliable results

The work on the Environmental Footprint aims to address exactly this issue. Through our research of existing leading methods in the area we have realised that in existing standards there is a lot of leeway for users to make methodological choices, which leads to incomparability of results and inconsistencies. Therefore, the Environmental Footprint methods are more prescriptive. Product category specific rules and Organisation specific sector rules will furthermore ensure that environmental performance is quantified in exactly the same way for similar products/organisations.

Some life cycle impact assessment models are not sufficiently mature

The European Commission's in-house science service, the Joint Research Centre has an in-depth understanding of the level of maturity of methods for measuring environmental impacts. In the methods and the product category specific rules we'll take this into consideration.

Sensitivity analysis of the impact categories with the highest uncertainty level can be reported in a PEF/OEF study as additional environmental information.

Life cycle data is not available

The Commission is aware of this issue and plan to work on the availability of high-quality life cycle data. One part of the work is to discuss and cooperate with international trade partners; to rely on the United Nations Environmental Programme to build capacity

² [Different options for communicating environmental information for products](#), BIOIS/ DG Environment, 2012

in developing countries to enable them to provide the necessary information; and to further develop the European Life Cycle Database, managed by the Joint Research Centre. Another part of the work is the methodology testing exercise we're planning for 2013. This will give us the possibility to test effective approaches to gather reliable primary life cycle data in supply chains.

How do the PEF and OEF methods fit together?

.PEF is for calculating the environmental performance of an individual product (i.e. good or service), thus it disaggregates environmental performance information to represent a single product.

OEF is for calculating the environmental performance of a well-defined product portfolio. OEF can be calculated using aggregated data – thus, there is no need to calculate individual PEFs and sum them up in order to get the OEF result.

Having the same basis and many rules in common guarantees that organisations calculating both their product and organisation footprint can exploit synergies and reduce the cost.

For organisation-level reporting it is possible to aggregate product portfolios' results to provide information on the aggregate performance of an entire organisation and track changes to its performance through time.

Comparisons are only possible within the same product category or business units producing a comparable product portfolio.

What are the next steps to complete the methodological work?

PEF and OEF methods can be used for a variety of applications. The methods could be used for the following applications:

- in-house improvement of product environmental performance (design for environment),
- communication (B2B and B2C) of the environmental performance of a product or organisation (without comparisons against similar products or organisations),
- improvement of production processes along the life cycle.

However, whenever the intention is to make a comparison against other products or organisations, some further methodological features will be developed. In particular:

- Product Environmental Footprint Category Rules (PEFCRs) and Organization Environmental Footprint Sectoral Rules (OEFSRs) will need to be developed for product categories and sectors through a multi-stakeholder process. These would be developed with the co-operation of volunteering stakeholders and industry during the 3-year testing proposed in the Communication *Building the Single Market for Green Products: Facilitating better information on the environmental performance of products and organisations*.

- Actions to simplify and increase the user-friendliness of the implementation of the OEF and PEF methods by individual organisations. This includes the encouragement of development of simplified interfaces and promoting research for supply chain cooperation in Life Cycle Assessment.

What is Normalisation? Why is it needed?

Normalisation is an (optional) impact assessment step for better understanding the results and to compare the different impact categories of an environmental footprint study. The normalised impact categories provide insight in the magnitude of the impact categories relative to a reference unit (e.g. CO₂ emissions of a product relative to the CO₂ emitted by an EU citizen).

The normalisation step is not mandatory when using the PEF method. It could be used as a way to identify the most relevant environmental impacts. In the pilot phase, normalisation factors will be made available by the Joint Research Centre and will be used. The feasibility of this approach will be then considered together with other methodological issues at the end of the pilot phase.

What is weighting? Why is it needed?

Weighting is an (optional) impact assessment step for better understanding the results and compare the different impact categories of an environmental footprint study. Weighting factors reflect the perceived relative importance of the environmental footprint impact categories considered. Weighted results for impact categories can then be compared to assess their relative importance (e.g. climate change more relevant than toxicity). Results can also be aggregated across environmental footprint impact categories to obtain several aggregated values or a single overall impact indicator. This is more a political than a technical decision to make.

Aren't the PEF and OEF methods too complex for SMEs?

SMEs that are part of international supply chains or that are competing with big producers on the market of green products already face multiple requests of providing life cycle environmental information based on diverging methods. This leads to high costs for them. A common methodological reference will reduce complexity and costs.

As this is a voluntary initiative, there would be no obligation or need to apply the PEF/OEF methods. This applies also for SMEs that are only active locally, are not part of the supply chains of multinationals or are not themselves internationally active.

For those who face requests for life cycle environmental information, and for those who wish to embark on a PEF or OEF process, the Commission takes efforts to make it easier and less costly by

- providing initial tools that help SMEs to provide environmental information based on the PEF and OEF methods;
- paying special attention to the involvement of SME organisations and SMEs in the development of PEFCRs and OEFSRs, especially in key points affecting them;

- making sure that PEFCRs and OEFSRs represent a simplification in the application of the PEF and OEF method;
- testing innovative approaches for data gathering that make it easier for SMEs to provide information;
- encouraging other relevant actors through the Recommendation to also take SMEs' needs into account and provide tools to assist them.

What is the relation between the work done by DG ENV (PEF/OEF) and the EnviFood Protocol developed by the European Food SCP Round Table?

The Commission is co-chairing all the Working Groups in the Food SCP Round Table, which however remains mainly an industry-driven initiative. The EnviFood protocol is going to be compliant with the PEF method. We see the EnviFood Protocol as the document translating the PEF requirement to the food, feed and drink sector but without being so specific to be considered as a set of Product Environmental Footprint Category Rules. The agreement we have with the various members of the Food SCP Round Table is to start working together from 2014 onwards to the development of a set of food related PEF category rules.

How will the Commission manage potential divergences between the methodological requirements in the Environmental Footprint methods and those in the EnviFood Protocol?

The Commission considers this possibility somehow unlikely, considering that the same colleagues who developed the EF methods are also co-chairing the Working Group in the Food SCP Round Table that is responsible for drafting the ENVIFOOD Protocol. It is of paramount importance that a coherent and consistent approach is promoted throughout all sectors. Some differences might be expected and accepted if duly justified. The Commission and the Food SCP Round Table will work together to reduce differences whenever possible as this is the best way to ensure reliability and comparability of information.

What's the link of the PEF method with EN 15804 and the work done by CEN TC350?

The most important outcome of the work of CEN TC350 related to the PEF method is the EN15804: Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products.

While the work of CEN TC350 focuses on construction products, the PEF method is more general as it can be applied to all types of products. The EN15804 thus is more situated at the level of PEF category rules to be developed in order to provide more specific requirements for different product categories than the general PEF method. This is therefore an important source to be considered when developing PEF category rules for construction products.

What is the relation between the PEF/OEF and The Sustainability Consortium (TSC)?

TSC (www.sustainabilityconsortium.org) is worldwide co-operation of companies, universities and NGO's working on harmonisation of sustainability measurement of products.

The Sustainability Measurement & Reporting System (SMRS) developed by TSC identifies hotspots and improvement opportunities at the category-level for different consumer products. This work draws on LCA studies for many environmental hotspots and also non-LCA-based scientific research for other sustainability issues such as social issues and biodiversity. This work is used by TSC members to share an understanding of sustainability issues and drivers in their own company and in their supply chains (training, innovation, agreeing about improvement plans in supply chains). They also set KPIs that companies can use to assess their product performance and report that to B2B customers.

This compliments the PEF, which operates at the individual product level and with an objective to support consumer-facing declarations. TSC's work can act as a starting point & stepping stone for companies starting on their product sustainability journey.

TSC anticipates working closely with the Commission to pilot both approaches in parallel. This will demonstrate a high degree of alignment between the two approaches and also show how companies working with one organization can also benefit from working with the other.

QUESTIONS RELATED TO THE POLICY

Why did the Commission decide to issue a Recommendation on the use of the PEF and OEF methods?

The problem that the Single Market for Green Products package aims to resolve first of all is the proliferation of methods. The Recommendation is a tool that can be a help to reduce the proliferation in an effective way, but, in the meanwhile, enables a voluntary application of the PEF and OEF methods.

Why did the Commission decide to launch a second pilot if there has already been one in 2011?

In 2011 the Commission organised a first road-test in collaboration with a number of volunteering industries. Food, feed and drinks, Retailers, Public Administrations, ICT, Water services, Energy production, Paper, Mining, Chemicals, Footwear, Televisions were the products/sectors for which the draft PEF/OEF methods have been tested. The results of this pilot contributed to modify the draft methods making them more implementable.

The pilots that the Commission will start in 2013 have completely different objectives. It will not be anymore about PEF/OEF methods that are already usable and based on existing and well proved LCA approaches. The new pilots have three main objectives:

1. Test the process for the development of Product Environmental Footprint Category Rules (PEFCRs) and Organisation Environmental Footprint Sectoral Rules (OEFSR)s
2. Test different approaches for verification systems (embedded impacts, traceability)
3. Test different ways of communicating the information for B2B and B2C.

Will Environmental Footprinting mean that the Commission will abandon existing, well-established tools?

No. For example, product instruments such as Ecolabel, Green Public Procurement and Ecodesign will be enriched through Environmental Footprinting (EF). The new tool is complementary, and gives the possibility to reinforce the life cycle perspective in these instrument and criteria-setting.

National initiatives could also benefit from using EF. This is particularly the case of ISO Type I labels, such as the Blue Angel or the Nordic Swan: EF can give valuable information on the most relevant environmental impacts and most important life cycle stages that define the environmental performance of a product and through benchmarking help identify better top performance in the market.

Another label will just increase confusion for consumers... let's not forget that products don't just carry environmental labels, but also other information (nutrition, ingredients, etc.)

Environmental information can take many forms. This might take the form of information at the point of sale (e.g. on shelves, brochures), on the product (e.g. labelling) or on other vehicles (e.g. websites, smartphone applications). We have to find the way that is most efficient and effective for conveying environmental performance information. We'll rely on studies and results of testing approaches in the EU and in different Member States. The French national "experiment" of environmental labelling is particularly interesting. We'll complement this with further, EU-level testing starting from 2013.

How is the PEF method going to be used in existing European policies like the EU Ecolabel?

The Regulation (EU) 66/2010 establishes the rules and conditions to develop Ecolabel criteria for products (including services). Already in the current Regulation it is prescribed that the Ecolabel criteria shall be based on existing or new LCA studies. Now that the Commission has adopted the PEF method, which is considered as the best available practice for doing LCA studies, that will be the reference method for performing all new LCA studies needed for developing Ecolabel criteria, whenever a new study will be necessary.

Are the Environmental Footprint methods going to compete with the Ecodesign approach?

The Environmental Footprint (EF) is not competing with the Ecodesign Directive. Most companies say that there are so many similar but competing standards and labels that it is becoming difficult to work in such "landscape". Moreover, there are several governments who are considering introducing policies with approaches similar to what the Commission has developed. The Commission considers that the application of the PEF and OEF methods will provide simplification and reduce costs. For example, one of the objectives of the EU pilot is to develop Product Category Rules (PCRs) together with stakeholders. It might well be that for some product categories this will not be possible. It is preferable to work with industry and develop together the right tailored approach instead of applying cross-cut simplistic approaches. After this pilot The Commission will discuss together with all stakeholders and decide if and how we can integrate elements of the EF methods into existing tools like Ecodesign or the EU Ecolabel.

What's the link between the OEF method and EMAS?

EMAS and OEF are complementary tools. EMAS is a management system, providing a management framework for the continuous improvement of environmental performance. OEF is a method to quantify life cycle environmental impacts (thus both direct and indirect environmental impacts).

The potential for the use of the OEF method in the framework of EMAS lies in measuring environmental impacts, providing indicators as a basis for setting and tracking indicators. If available, Organisation Environmental Footprint Sector Rules (OEF SRs) can inform EMAS Sectoral Reference Documents (SRDs) regarding the most relevant direct and indirect environmental impacts of a sector and provide a basis for sector-specific key performance indicators.

At the next revision of the EMAS Regulation it will be considered if and how the OEF method can be used in the framework of EMAS.

What's the role of standardisation?

The PEF and OEF methods have been developed by the European Commission's Joint Research Centre (EC JRC) relying on existing standardisation work and leading methods developed by other actors. This was a choice due to policy needs.

As soon as the method and rules for the creation of sector-specific and product category specific rules are confirmed and the pilot is evaluated, the Commission will consider whether standardisation can be the appropriate tool for providing further developments.

How does the initiative address the issue of communicating information on the environmental performance of products and organisations?

The SMGP Communication includes a list of principles that relate to the transparency, availability and accessibility, reliability, completeness, comparability and clarity of communication on environmental performance. The Commission does not prescribe a specific approach or label for use, but recommends that companies follow these principles when they are deciding on different options in terms of the content, format and

channels of communication. Compliance with the principles would make communication more effective and efficient, and would improve consumers' understanding and ability to compare between different goods and services. It would help avoiding avoid poorly implemented action that can confuse or mislead users, inhibit decision making and undermine the trust in environmental claims.

How will the use of PEF and OEF affect international trade?

The use of PEF and OEF is voluntary, therefore, it will not act as a restriction on international trade. Instead the Commission is convinced that this initiative would bring the same benefits to EU and non-EU products and organisations alike. A progressive application of PEF and OEF methods would reduce the need for third-country companies to comply with multiple requirements existing across different domestic markets in the EU. A single study based on the use of PEF and OEF could be used for complying with requirements across a number of private and public schemes and requirements existing in different EU Member States, which would lead to reduced administrative costs for companies who want to sell goods and provide services across the Single Market. A further benefit would be that the use of these methods would provide assurance for schemes and labels helping to ensure that they are based on solid science and non-discriminatory. "Green" goods that are produced and organisations that are based outside the EU would also benefit from increased consumer confidence in environmental claims in Europe.

QUESTIONS RELATED TO THE PILOTS

Representativity criteria: do I have to ensure the participation of 51% of the market before applying?

No, there is no need to comply with this requirement at the moment of applying for the pilot. It is during the pilot that the Technical Secretariat needs to make a serious effort to comply with the representativity criteria. As the resulting PEFCRs and OEFSRs will be the rules for the sectors and product groups covered under PEF and OEF in the EU, it is essential that the process is representative of the market.

The 51% rule will be evaluated at the end of the pilot. If that threshold is not reached then the documents will not be published and its results will not be taken into account during the analysis of the results of the pilot phase.

When will you check compliance with criteria regarding "representativeness"?

Active participation of stakeholders that represent at least 51 % of the market will be checked at the end of the pilot. Where this criterion is not fulfilled, the Steering Committee will take a decision case-by-case on the way forward.

The invitation of all companies contributing to more than 10% to the EU market and of 75% of the EU market (in terms of yearly turnover) will be checked before the first physical meeting. Invitation of different stakeholder groups such as NGOs, SMEs associations, etc. will be checked continuously throughout the process.

Representativity criteria: How detailed should the market analysis be?

It is expected that for some product groups data is not readily available and new market studies may need to be conducted. Considering time constraints, a less detailed market analysis with indications or estimations on market data would be accepted at application under the condition that a more detailed analysis is presented latest at the start of the pilots (in September 2013).

How will the participation of stakeholders work?

After having selected the product groups and sectors covered by the 1st wave of pilots, the Commission will publish these on its website (expected in September). At this point, stakeholders will be invited to sign up to participate in the work regarding the pilot cases they're interested in.

Is the sector of "packaging for food and drinks" planned to be covered in the 1st wave of pilots (call for volunteers published in June 2013) or will this sector be covered in the 2nd wave of the pilots in 2014?

In the ENVIFOOD Protocol it is clearly mentioned that the packaging is part of the food supply chain. For this reason packaging of food and drinks will be covered by the 2nd wave of pilots of the Environmental Footprint pilot phase.

Will the second phase be open only to "food, feed and drink products" and sectors?

Probably yes. In case we can secure more resources, it could be open for other sectors as well, but unfortunately it's difficult to estimate our chances to have them.

What happens if you receive multiple applications for the same product group or sector?

In case we receive multiple proposals addressing the same product group (or very similar), the Commission will try to negotiate with them a common agreement. If this fails, then the Commission will select one of the proposals asking the other to join as stakeholders.

What is the definition of an intermediate product for the pilot?

We consider final products those that don't go through further transformation before being used (e.g. insulation panels would also be a final product, as they are built into the house as they are).

The guidance allows to test other end of life formulas than 50/50. What does this mean?

We'll keep on having a single formula for recycling. We are aware that there are some issues with the current formula, so we allow for additional formulas to be tested to see whether we can find a better solution during the testing. In case we do, we'll review the formula in the methods.

Do I have to share sensitive data with other pilot participants?

No, there is no need to share data directly with other participants. The Technical Helpdesk will also act as an independent data centre, and will sign confidentiality agreements with all participants requiring this.