



EUROPEAN COMMISSION

**Summary of Discussions at the
2nd Integrated Product Policy Expert Workshop
Environmental Product Declarations (ISO 14025
Technical Report)**

Brussels, 16th May 2001

1. BACKGROUND INFORMATION ON THE EXPERT WORKSHOPS

Following the adoption of the Green Paper on Integrated Product Policy (IPP) in February 2001 the European Commission embarked upon a stakeholder consultation exercise, which will finish on 30th June 2001. In addition to welcoming written comments on the Green Paper the Commission has organised a series of meetings, the first of which was the Conference to launch the stakeholder debate on the 8th and 9th of March 2001.

The Commission has also organised seven small expert workshops on particular aspects of IPP. The aim of these workshops was to inform the Commission about particular aspects of IPP to help the Commission in framing its ideas for the forthcoming follow-up Communication on IPP. Participants were invited to apply and around ten were selected on the basis of their expertise and experience. The Commission is aware that with such a small number of participants it will not be able to canvass all experiences and opinions represented. For this reason the input from such meetings is seen as being just a part of the stakeholder consultation process.

This document, therefore, represents a summary of the discussions at the workshop. There was no attempt to reach conclusions or consensus and the fact that a particular viewpoint was expressed at the meeting without being contested does not necessarily mean that the Commission accepts it.

2. BACKGROUND TO ENVIRONMENTAL PRODUCT DECLARATIONS

Although the question of what is an environmental product declaration (EPD) was not explicitly discussed at the workshop this description arose out of the discussions and is placed here to aid the reading of this document.

Within the ISO framework an EPD contains a variety of information about the composition and environmental characteristics of a product based on life-cycle assessment (LCA). The exact type of information is specific to a particular type of product group and is determined in “product specific requirements” (PSR). These are drawn up by industry in full consultation with stakeholders and competitors. They do not contain limit values, although they can contain thresholds below which the presence of certain LCA data does not have to be declared as it is not cost-effective to collect. The information is then presented in a common format and in a neutral way that enables evaluations and comparisons by the purchaser but which does not seek to judge the environmental characteristics of a product. The quality of the information is then verified by a third-party source and can be accredited if this is considered necessary to give additional credibility.

It is clear that there are other possibilities to pass information from business-to-business and that some of these may not be based on LCA. However, this workshop concentrated on EPDs.

3. PARTICIPANTS

Georges Bourdila (France Nature Environnement)

Nicola Breier (European Commission)

Bernd Dannhorn (Hohenstein Institute)

Bengt Davidsson (Swedish Environmental Protection Agency)¹

Robert Goodchild (European Commission)

Henri de Henau (European Soap and Detergent Association)

Paula Higgins (European Commission)

Geir Jorgensen (Norwegian Pollution Control Authority)

Riitta Larnimaa (Confederation of Finnish Industry and Employers)

Elisabet Olofsson (SCA Hygiene Products)

Annalies de Ruiter (European Commission)

Sven-Olof Ryding (Swedish Environmental Management Council)

Tina Sternest (Confederation of Danish Industries)

Rikke Traberg (Danish Environmental Protection Agency)

Davide Vassallo (Italian Environmental Protection Agency)

4. PRESENTATIONS

The workshop began with several presentations and descriptions. These are summarised below.

4.1. The ongoing work in the International Standards Organisation (ISO)

Mr Sven-Olof Ryding (Swedish Environmental Management Council) gave a brief overview of the history and ongoing work within the 14020 series within ISO. Briefly, ISO Standard 14020 establishes the ground rules for all eco-labels and declarations. ISO Standard 14021 establishes the rules for self-declared environmental claims, also known as green claims (and also known as ISO Type II labels) and ISO Standard 14024 for third party verified environmental-labels (also known as Type I).

Work on ISO 14025 – Environmental Product Declarations (EPD) (also known as ISO Type III) began in 1993. This has now attained the status of Technical Report and discussions are currently ongoing considering how this should be further developed into a standard.

¹ Council Presidency Observer

Mr Ryding sought to simplify consideration of the different types of labels with the matrix below which outlines where the differing standards fit in.

Name	Unverified	Verified
Environmental Labels	14021 (Type II)	14024 (Type I)
Self-declared Environmental Claims	14021 (Type II)	-
Environmental Product Declarations	-	14025 (Type III)

4.2. The Global Type III EPD Network – GEDNET

Mr Ryding also informed the participants about the existence of the Global Type III Environmental Product Declarations Network (GEDNet). There are nine members (Canada, Denmark, Germany, Hong Kong, Italy, Japan, Norway, South Korea and Sweden). Its objective is to share practical experiences and seek mutual recognition outside of the ISO process.

4.3. The Nimbus Project

Mr Geir Jorgensen of the Norwegian Pollution Control Authority presented the NIMBUS project to the meeting. This is a project initiated by industry in Denmark, Norway and Sweden, which looks at the potential for developing a pan-Nordic EPD project by developing pilot projects for particular products. During the discussions Mrs Larnimaa from the Confederation of Finnish Industry and Employers explained that they did not participate in the project because they wanted a more international system.

4.4. The Italian EPD System

Mr Davide Vassallo of the Italian Environmental Protection Agency (ANPA) presented their progress in setting up an EPD system. They have drawn-up draft guidelines (which can be downloaded from www.sinanet.anpa.it/ecolprod) and are currently examining the responses to a consultation exercise before launching the scheme this July. Comments have been received from a wide variety of stakeholders, including environmental organisations.

The ANPA will be responsible for the guidelines but it will be for organisations and interested parties to develop the PSR and take part in the consultation exercise with stakeholders and competitors. This development is overseen by the EPD technical commission as well as their approval, registration and review. Separate certification bodies ensure that the information contained in the EPD is correct and separate accreditation bodies are responsible for accreditation.

The EPD system is based on the full life-cycle approach based on ISO Standards 14040, 14041, 14042 and 14043. All PSRs will have to define a

minimum quantity of information that is common to all products. The PSRs must be developed with the inputs of interested parties and third party certification must be by accredited bodies. 3rd Party accreditation is considered to be necessary both to ensure credibility and because the system is not a very easy one and there is considerable scope for error.

Pilot projects are already in operation with the ANPA working with interested companies to derive PSRs and EPDs for some technical products. It is intended that the Italian and Swedish systems will be recognised as being equivalent and PSRs developed under one system will be valid under the other.

4.5. The Swedish EPD System

Mr Ryding reported that the Swedish scheme began at the end of 1998 and is being developed by the Swedish Environment Management Council under a mandate from the Swedish government. Industry was the main stimulus for the development of the project because it was they who, within the framework of EMAS, questioned the desirability of signing a statement on the site's environmental impacts if they didn't know what was coming from their suppliers. So far 20 PSR documents have been developed and some 30 EPDs have been registered. These were entirely market-driven and were not chosen by the authorities. One producer alone can initiate the exercise but there are safeguards for competitors involved

The system that is used is very close to the Italian one. There are two committees that ensure stakeholder participation. The Consultative Committee consists of governmental organisations, industry and consumers, with environmental NGOs having refused to participate. The technical committee considers and approves the PSRs. A large amount of the information produced is available on their web-site – www.environdec.com – including on the drawing up of PSRs.

4.6. Development of an EPD System in Denmark

Rikke Traberg (Danish Environmental Protection Agency) and Tina Sternest (Confederation of Danish Industries) reported on the steps towards the development of an EPD system in Denmark. Following a feasibility study a working group was established consisting of consumers, industry, government and retailers. This working group produced a recommendation and a report, which are now open for consultation. In general there was agreement that the system needed to be a unified, voluntary system and it should be as international as possible. The system should be based on ISO 14025 and focussed on business to business communication with a clear link to ISO 14001 and EMAS. The only point on which there was no consensus was the question of third party certification and accreditation. Here the industry representatives felt that certification was not necessary because the market would regulate itself, meaning that it was often unnecessary to have certification because the firms – either through experience or reputation – trusted the statements of their suppliers. The other stakeholders involved in drafting the report felt that independent certification was necessary to ensure credibility.

4.7. The Oeko-Tex System

This system was presented by Mr Dannhorn (Hohenstein Institute) developed in Germany and Austria for the certification of textiles. Two types of label are available, the first concerned with “Human Ecology” with factors affecting human health and the second referring to “Production Ecology” focusing on the environmental impacts of production and the products themselves.

While this label is assessed and managed by independent assessors it does effectively present a pass or fail system and hence is not an Environmental Product Declaration. Nevertheless in order to achieve an Oeko-Tex label it is clear that a certain amount of knowledge about the supply-chain inputs have to be known. The process is, however, highly confidential and has minimal stakeholder involvement.

4.8. Activities in Finland

Mrs Larnimaa reported that Finland was not currently participating in any EPD system but their industry has developed methods for business-to-business partnership in which information flow is very important. Industry is also working with commerce on a project to ensure that information passes along the supply chain in the correct way. The results of which will be published soon. Consumers and NGOs were not involved in these projects at this stage. In addition she added that she was aware that the textile industry was developing a form of EPD, as was the European paper and pulp industry.

She also added that business-to-business customers request information about the environmental aspects of products in a standardised form and it is clear that EPD is a good tool to facilitate this.

5. FOCUSED QUESTIONS

Various issues emerged at different points during the workshop which have been grouped and are summarised in the following sections.

5.1. Target Purchasers

The workshop did discuss in passing the purchasers who are most likely to use this type of label. There was general agreement that it would be mainly professional purchasers, whether in the public or private sectors, rather than consumers.

5.2. Relationship to other Types of Label

Ms Traberg raised the possibility of exploiting the synergies between a Type I eco-labelling system and EPDs. Mr Ryding also saw the two systems as being complementary as did Mrs Larnimaa. He also stated that there was obviously considerable scope for extra information to be added to the EPD and that this should preferably be in line with ISO 14021.

Mr de Henau (European Soaps and Detergents Association) added that he felt the great advantage of EPDs over eco-labels was that they did not confer a judgement, instead enabling informed decisions.

5.3. Question of Accreditation

There were apparent differences in the value of accreditation. The Danish difference already mentioned under point 4.6 was clear and the Danish industry's position was supported by Finnish industry. However, Ms Olofsson did stress that accreditation was important. Mr Ryding stated that the Swedish experience supported the view that accreditation was necessary. Mr Bourdila (France Nature Environnement) was also strongly behind certification.

5.4. Life-Cycle Assessment (LCA)

The representative of Finnish industries stated that she was aware of a type of EPD being developed by the paper and pulp industries without being based on LCA because their customers did not want this.

The question of the cost of LCA was also raised, but in relation to the discussion on accreditation. Here Mr Ryding stated that, in his opinion, if a company had spent a considerable amount of money developing an LCA then the accreditation would represent a relatively small cost to acquire.

5.5. Stakeholder Participation

In general the participants felt that there was a need for a high level of stakeholder participation in order to provide such a system with credibility. Some reservations, however, were expressed concerning the lack of technical knowledge of some stakeholder groups.

5.6. Participation of SMEs

Mr Ryding expressed the opinion that a good and freely accessible LCA database would be significant help to SMEs. SMEs do participate in the Swedish system, but there is no doubt that bigger companies are readier.

5.7. Purchaser Education

It was stressed by many that without proper training of purchasers, including those in the public sector, EPDs would be of limited use.

5.8. Other issues

The issue of accreditor training was considered to be crucial by Mr Vassallo.

Mr Ryding highlighted the need to consider what should be in the PSRs as this is not yet covered within the Technical Report ISO 14025.

Mr Ryding also felt that EPDs should consider how to deal with the issue of product contents because otherwise there is a risk that legislation be brought in.

Mr Bourdila stressed that the three pronged objectives of sustainable development should not be overlooked.

6. WHAT WOULD BE THE ADVANTAGES AND DISADVANTAGES OF DEVELOPING AN EPD SYSTEM AT THE EUROPEAN LEVEL?

The participants were asked this question. Messrs Joergensen, Ryding and Vassallo and Ms Sternest and Ms Traberg were all positively disposed towards the development of a European system along the lines of the ISO 14025 framework. Mr Vassallo stated that a positive move from the EU would provide more impetus to their work in Italy. Mr Ryding stated that the mandate to establish the Swedish system required that it had to make any system internationally recognised.

Mr de Henau felt that if a system were to exist it should be on the European level but that care should be taken not to replicate what he considered to be the mistakes with the European eco-labelling scheme. Ms Sternest supported this. Mrs Larnimaa was also concerned about this last point and the possibilities for including SMEs and felt that any system would have to be as minimalist as possible. She also stressed that a standardised form is needed but it must be recognised that a LCA based EPD may not be suitable for all industry. She felt that as products have very different environmental profiles industry based solutions, not necessarily based on LCA, may be more appropriate than standards, technical reports and guidelines as these can only give general guidelines on how to develop EPDs. It should also recognise that it may not be suitable for certain industries – such as the pulp and paper industry. Ms Olofsson stated that they were now receiving many different requests for product information and they would benefit from a common, credible and international format.

Mr Bourdila was particularly concerned about ensuring adequate stakeholder participation

7. HOW COULD A EUROPEAN EPD SYSTEM BE BEST DEVELOPED WITHIN THE CONTEXT OF IPP?

In the Green Paper the Commission suggests that a “Wider Labelling Strategy” may be needed to look at the different types of labelling affecting the environmental aspects of products. Would the development of an EPD system be best done within this context?

Here there was general consensus amongst the delegates that some form of wider-labelling strategy was needed. It was suggested that it needs to cover:

- The differences between the different type of labels, their scope, suitability and benefits.
- How to educate and communicate with the procurers and consumers as well as issues of marketing.
- Both mandatory and voluntary labelling and their interaction.

- Whether it is possible to see a progression for a company through the different types of labelling and whether a step-wise procedure is time-efficient.
- Methods for acquiring the full satisfaction of all partners.

The question of time was particularly raised by Ms Traberg who stressed that any wider-labelling strategy should not unduly delay any European EPD development.