

**Comments on the study “Environmental impact of products (EIPRO);
Analysis of the life-cycle environmental impacts related to the total final
consumption of the EU 25”
Full draft report, 29 April 2005**

The study uses a huge amount of data and a methodology that is beyond the scope of one industry sector to comment on. Therefore, we limit our comments to few observations.

Using life-cycle assessment in policymaking: Even if the results confirm the beliefs of the industry that often the products politically most attractive as targets for environmental legislation are not always the ones with the biggest environmental impact and even if interpreting the results and turning them to policy actions are outside the scope of this study we want to remind that using a tool that is primarily designed for companies (together with their suppliers and customers) to improve their environmental performance as a basis for policymaking is always difficult. Some details of this study that make the task even a bigger challenge are reflected below.

Data: We understand that the methodology used in the study requires a lot of data and all of that is not easily available. The solution that in the absence of European data US data on production and consumption patterns have been used raises some concerns. The same applies to the extension of the EU-15 data to the new EU Member States.

The observation that the EU environmental data on economic activities are much poorer and not as up to date as the data from the US for example is very interesting as at the same time the environmental legislation tends to be more plenty in the EU than in the US.

Completeness of the results: We do not understand the discussion on the completeness of the results and in particular the discussion on packaging and products and services mainly used in the B2B sector (page 94 of the report). The report states that the impact of these types of products is not visible.

In case of packaging the reason is reckoned to be the fact that it has been assessed in connection with a product it contains. We are of the opinion that this is the only correct way to address the environmental impact of packaging, as analysing the packaging in isolation fails to take into account why packaging has been produced for the first place: to protect the product in contains and hence to avoid negative environmental impact.

Most of the paper is indeed sold to as B2B products and it is only then converted into products the consumers use like newspapers, magazines, books, stationery, etc. These products, as far we understand, have been addressed in the study and again, this is the only correct way to assess the environmental effect of paper.

Renewability: The benefits of using renewable materials instead of non-renewable ones have not been addressed by the study. Forests, for example, form an inexhaustible source of raw materials when managed in a sustainable way. It seems that life-cycle assessment is a tool that simply cannot take that aspect into account; yet another point that requires cautiousness when interpreting the results of any LCA.