

Reaction of the EIPRO project team on comments by CEPI

1. Extract of comments: [...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...]

Reaction: Indeed this study does not point out directly where and which policy actions would be most successful. That is beyond the scope of the study and stated in the introduction of the study. This study has not developed a tool primarily to be used by companies for improvement analysis of their products. Environmental input-output analysis studies may provide important insights into those consumption domains, products, and related economic activities where environmental impacts are highest. In a later stage such data might be linked by companies, and others, in evaluating more specific products

2. Extract of comments: [...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...]

Reaction: EU environmental data are indeed poorer (or at least more fragmented) than in the US. However this does not relate to having less environmental legislation in the US. It is more related to the way environmental standards are enforced in the US, with more emphasis on public availability of data also in relation to liability. This means that emissions from industrial plants are very well monitored, and data are publicly available. Besides this difference in control strategy, industries are forced to publish all their emission data and all of these data are public. See for example the public information at <http://www.scorecard.org/>.

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3. Extract of comments: [...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...]

Reaction: The environmental impacts caused by packaging should be evaluated in conjunction with the function provided (e.g. protection of the product). This holds for all products and services considered in this study. Nonetheless, the environmental impacts by packaging may in principle be shown also separately to understand the environmental implications of packaging. This could not be done in the current EIPRO study.

4. Extract of comments: [...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...]

Reaction: In general, LCAs should, and do, take the difference between inexhaustible and exhaustible resources into account. This goes as far as taking into account CO₂ uptake by the forests. Biomass based products do not contribute to CO₂ emissions. Depletion scores now reflect abiotic depletion only, with a dominant role for fossil fuel in the EIPRO case.