

ECO Platform Position Paper

Response to PEF Consultation

ECO Platform welcomes the consultation of the Commission regarding Product Environmental Footprint and highlights the importance of LCA-based data provision for public and private procurement, and eco-design of products. In the particular case of construction products as well as electric, electronic and HVAC-R equipment the availability of this information also makes it possible to assess the life-cycle impacts at building and civil engineering works level.

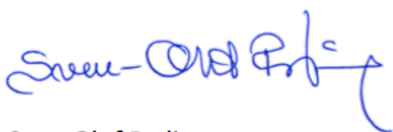
Environmental footprint verification is crucial for a reliable information and smooth application. The Commission should consider current verification schemes based on ISO 14025 to strengthen the verification proposal under PEF system.

The applicability of Environmental Product Declarations (EPD) throughout Europe has been in the focus of the ECO Platform and the common verification and Audit guidelines are the main path forward to achieve this. ECO Platform offers support to the Commission based on years of experience of their members to prepare a thorough and reliable verification system in the field of products.

ECO Platform therefore asks the Commission to consider the “Audit and Verification Guidelines for ECO EPD Programme Operators” issued by ECO platform when developing guidance for PEF verification.

Through the alignment of EPD and PEF it would be possible and certainly preferable to have only one verification system. We would also avoid having to align procedures afterwards.

European construction product and EEE industries provide LCA-based information on the environmental performance of their products with hundreds of verified EPD. For the calculation of the environmental performance of construction products and EEE, ECO Platform asks the commission to use the applicable standards created in the European standardization committees CEN/TC 350 and CENELEC TC111X.



Sven-Olof Ryding
President ECO Platform



Christian Donath
Managing Director ECO Platform