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Answers to the questionnaire regarding Product Environmental Footprint:
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a) *Main objectives of the documents*

- *Are the main objectives of the documents appropriately defined?*

YES

- *Is the target audience identified and appropriate?*

YES

B) *Scope of the document*

- *Does the document sufficiently focus on the key issues?*

NOT SURE. Is very ambitious in detail. However, an arbitrary aggregation of impact-indicators, with or without weighting, obscures what exactly is being measured and makes it difficult to interpret results meaningfully. With covering the consistency criteria, it is sufficient for benchmarking and sector-specific process improvements. With no reference to resilience or sufficiency either, it is a long way from a true measure for environmental sustainability of a product/service.

- *Are any issues left out / missing?*

We miss useful indicators related to resource-use and absolute global carrying capacities, namely biocapacity. These types of indicators (esp. Ecological Footprint) are key to detect and measure ecological overshoot. While we acknowledge the difficulty of incorporating ecosystem-indicators into impact assessment approaches, omitting them is no solution either!

- *Are any issues / topics covered unnecessary and should be deleted?*

Building a complex system for environmental accounting aimed at comparability of results is very welcome, even at the cost of present flexibility. However, regardless of present day choices of indicators, the methodology (system boundaries, allocation-rules,) and its application-interfaces should be, in principle, invariant towards the type of indicators used, thus providing a starting point rather than an end version.

- *Are the Environmental footprint guide and the additional information sufficient to conduct an Organisation Environmental Footprint study? If not, what is missing?*

Despite good definition for data quality in general, requirements for comprehensive LCA source databases with free public access and other publicly provided data remains unclear.

The Commission should make sure to guarantee open interfaces to avoid the need for proprietary software in footprinting applications.

C) *Appropriateness and usability for the target audience*

- *Does the content meet the needs of the intended target audience?*

The selection of indicators, methods, respective factors and weightings seem, as far as described at all, quite arbitrary.

To allow dissent or consent and to give comments in more detail, more transparency is required about the criteria for the selection of the indicators and their references and the reasons for the choices made.

Further, we miss a process for updating factors and adding new indicators and even totally new aspects to the current set of metrics.

- Can the use of the document help performing high quality environmental footprint studies, especially by improving quality and consistency?

Consistency YES, Quality? See above!

- Is the structure clear and logical, including subdivision in chapters?

YES

- Is it written in a clear and understandable language suitable for the intended target audience?

YES

D) Robustness/suitability of requirements

- *Does the document provide additional guidance/support compared to the general requirements in other organisational environmental accountancy guidance documents?*

In general, YES. Depends on the starting point-

- *Do the requirements/ recommendations in this guide e.g. related to defining system boundaries (organisational and Organisation Environmental Footprint boundaries) data sources, data quality, dealing with multi-functionality, etc., increase the reproducibility/ comparability of results?*

YES, very useful.

- *Do the requirements and choices reflect best current practice?*

YES, but current practices are not good enough.

- *Are the requirements and choices applicable/feasible?*

YES

- *Does the provision of default values in the general guide increase reproducibility and comparability?*

YES

- *Are the default values provided in the general guide helpful and as realistic as possible?*

NOT YET, NOT ENOUGH, but reasonable start.

- *Please add other recommendations and observations*

The PFCR are a useful extension of the methodology. However, allowing too many and too narrow PFCRs will reduce the approach to sector-benchmarks rather than providing useful guidance and effective steps towards a truly "Resource Efficient Europe". The latter will require to actively discriminate against wasteful, polluting and resource depleting products and services. Comparing EFP of different flight-services does indeed give a different information than comparing flights with travel by train.