

Template for comments

Send back to:

- ENV-ENVIRONMENTAL-FOOTPRINT@ec.europa.eu
- helpdesk.envfootprint@pre-sustainability.com
- lca-waste@jrc.ec.europa.eu

By **28/11/2011 at the latest**

Commenter: Wolfgang Pekny / Netzwerk Footprinting

Confirmation: Herewith I confirm that my feedback/input can be published on the internet, together with the consulted document (please mark if you agree): yes

Date: November 7 th 2011	Document: Organisation Environmental Footprint Guide – Draft for consultation
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1	2	3	4	5	6	7
Page	Chapter No./ Annex (e.g. 3.1)	Paragraph/ Table/ Figure (e.g. Table 1, Last sentence of 3 rd paragraph)	Type of comment	Comment (justification for change) (e.g. The meaning of the sentence is ambiguous, please clarify.)	Proposed change (e.g. Replace the sentence with the following one: "..."; Add the following definition for the new term XYZ: "...")	Comments / feedback to stakeholder or co-operation partner
5	Summary		ge	<p>Timeframe for comments was extreme short-time, almost impossible to consult our members in depth.</p> <p>The proposed standard reduces the diversity of methodological approaches for the aim of comparability of results, for the good or the worse. Beside its shortcomings, its strictness and narrowness will reduce the dissemination of environmental accounting, for the time being, unless legally mandatory.</p>		
39	5.5. Selecting Environmental Footprint Impact Categories and Assessment Methods	Table 2	ge/te	<p>The selection of indicators, methods, respective factors and weightings seem arbitrary.</p> <p>More transparency is required about the criteria of the selection and the reasons for choices made to allow comments in more detail.</p> <p>For understanding, the selection process for a specific method should be documented including all alternatives and selection criteria – valid for the current selection and future revisions.</p> <p>Furthermore, the process for updating factors and adding new indicators and even new aspects needs to be described to fulfil the claim of universal applicability.</p>		
75	7.2.2. weighting of environmental Footprint Impact Assessment		ge	<p>Whatever the criteria for weighting will be, there must not be a "blackbox". All factors need to be transparent and traceable. Further, a procedure to challenge the current assumptions over time need to</p>		

1 **Type of comment:** ge = general te = technical/specific (ed = editorial ; Note that editorial corrections of the English are not necessary as this will be done on the final version.)

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	Results		te	be provided.		