

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):

Date: November 28 th 2011	Document: Product 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
3	Executive Summary		ge	<p>Timeframe for comments was extreme short-time, almost impossible to consult our members in depth.</p> <p>This standard reduces the diversity of methodological approaches for the aim of comparability of results, for the good or the worse. Anyway, for the time being, it's narrowness will reduce the dissemination of environmental accounting, unless legally mandatory.</p>		
7	2.2 Role of PFCRs		ge	<p>PFCRs are a useful and necessary extension of the methodology. However, allowing too many and too narrow PFCRs will reduce the power to guide towards sustainable production and consumption and reduce the approach to mere relative sector-benchmarks. Comparing EFP of different flight-services will give a considerable different information than comparing trains with flights.</p>		
31	5.4 Selecting Environmental Footprint Impact Categories and Assessment Methods	Table 3	ge	<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</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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75	7.2.2. weighting of environmental Footprint Impact Assessment Results		ge	<p>adding new indicators and even new aspects needs to be described to fulfil the claim of universal applicability.</p> <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 be provided.</p>		
108	Annex III			<p>We appreciate the general approach to not include credits and offsets into the EFP assessments.</p> <p>However, the credits referred to in the Annex III for multi-functionality issues involving material recycling or energy recovery, seem inconclusive and out of the line.</p>		