

ANEC CONCLUSIONS FROM THIS AND EARLIER STUDIES COMMISSIONED

Concerning Product Carbon Footprint (PCF)

- Although carbon footprinting offers some new opportunities for product labelling and product specific environmental regulation in principle, the inherent methodological constraints of the approach limits its useful application in practice.
- As by nature, PCF only focuses on a single environmental aspect – emissions of greenhouse gases - it may lead to the disregard or even amplification of other environmental impacts.
- A single issue product carbon footprint label or declaration will in most cases not be reliable or useful. A reasonable environmental information system for products as well as environmental product regulation must cover all significant environmental aspects, at least in form of a screening analysis, covering the full product life-cycle.
- A fundamental problem of PCF studies – similar to this of LCA studies in general – is that the results depend strongly on numerous methodological choices made in the conduct of a study (e.g. relating to the definition of the functional unit including service life time, boundaries, selection of data, scenarios for transport, user behaviour or disposal, allocation rules, etc.). This makes the results reflect a rough approximation of the reality and lack precision, as opposed to results which could be obtained from energy measurements using harmonised, well defined test methods. As a consequence, PCF data from different businesses or other parties are barely comparable. Any policy measure based on such non-robust data would not be successful.
- The ISO standard on carbon footprint of products currently under development contains only generic rules leaving room for interpretation and will not solve the problem of comparability.
- Comparable PCF results can only be achieved on the basis of adequate product specific rules complementing generic rules – so-called Product Category Rules – provided that they are elaborated in a transparent and democratic manner involving all relevant stakeholders in a balanced way. However, it would require a high amount of resources to cover only the most important products and it is questionable whether it is worth the expense.
- Existing carbon labels providing numerical carbon figures are not only doubtful from a methodological perspective but they also do not bring any benefit for consumers. They are hardly understood by consumers and do not enable them to identify the most environmentally friendly products (from a climate change