Ferrous and non-ferrous metals comments on the PEF methodology

Brussels, 25th April 2013

Background

The metal industry considers that Life Cycle Assessment in line with ISO 14044 is the most appropriate approach to assess the environmental impact of products along their full life cycle. Hence, the metal industry supports the development of a harmonized EU methodology (as stated in the EU resource efficiency roadmap).
The metal industry however would like to state some concerns related to the Product Environmental Footprint (PEF) methodology published by the European Commission on 9/04/2013. Indeed, while the so-called "end of life recycling approach" was used in the draft PEF methodology released in August, 2012, the recently published PEF methodology uses the so-called "50/50 approach" (i.e. considering 50% of the benefits of the recycled content and 50% of the benefits of the end of life recycling).

Identified issues of concern

1) The 50/50 approach in the PEF methodology discriminates recycling vs. energy recovery since at the end of the life stage, energy recovery gets the full environmental credit (100%) whilst recycling only gets 50% of the credits. As such, this methodology discriminates recycled materials vs. materials which are incinerated with energy recovery (see example in ANNEX).
2) By doing so, the PEF methodology is not consistent with the "waste hierarchy" set by the EU Waste Framework Directive (which gives preference to recycling vs. energy recovery) as well as with the view expressed in the Roadmap to a Resource Efficient Europe "… to move towards an economy based on re-use and recycling …" (the so-called circular economy).

EU Waste Framework hierarchy: recycling should be preferred to energy recovery

Recommendation

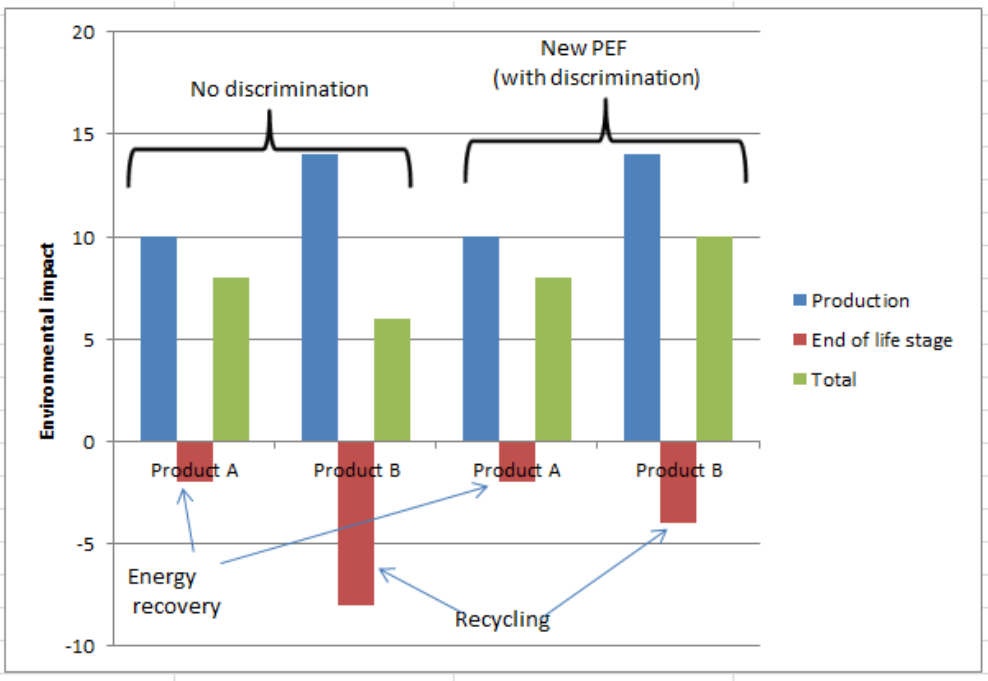
Ferrous and non-ferrous metal industries recommend adapting the PEF methodology to reflect the true benefits of recycling in a transparent and robust method.
Therefore, the ferrous and non-ferrous metal industries are requesting a meeting with the Commission services. Our industry experts have experiences and data about possible solutions to consider recycling for different product types which can usefully contribute to the improvement of the PEF methodology.

One example of a more adequate solution can be found in the CEN standard EN15804. This approach reconciles both aspects of recycling during the production phase and at the end-of-life phase, whilst avoiding any double counting. This approach leads to a methodology able to reflect the true environmental benefits that result from "design for recycling" efforts in the building sector, being a key target in eco-design legislation.

ANNEX: example on how the published PEF method discriminates recycling vs energy recovery when products get full credit (100%) for energy recovery whilst getting only 50% for recycling
Example with 2 products having the same function:

- Product A: made of a virgin material with low environmental impact which is incinerated at end of life;
- Product B: made of a virgin material with higher environmental impact (compared to product A) which will be fully recycled at end of life (keeping the inherent property)

	Environmental impact (without discrimination)		Environmental impact according to published PEF (discrimination)	
	Product A	Product B	Product A	Product B
Production	10	14	10	14
End of life stage	-2	**-8**	-2	**-4**
Total	8	6	8	10



LCA method without discrimination shows that product B has less total environmental impact compared to product A. The published PEF methodology gives the opposite result.