

Questionnaire Businesses and sectoral /business associations

Fields marked with * are mandatory.

This questionnaire is targeted at businesses and sectoral/business associations.

There are other questionnaires available, targeted at:

- NGOs - <https://ec.europa.eu/eusurvey/runner/7e181850-5622-8de0-048b-0a4a03c71b29>
- Public administrations and international organisations - <https://ec.europa.eu/eusurvey/runner/093d8fba-e2cd-8732-d2ce-5c273ae96ae5>
- Method/initiative owners - <https://ec.europa.eu/eusurvey/runner/efe2a9a6-3f2c-fc54-5781-86dfe198ce72>
- Investors and financial institutions - <https://ec.europa.eu/eusurvey/runner/cf4ab21c-e97a-d0cd-4490-94254d858870>

A public consultation on a product policy framework for the circular economy will also be available soon. It will also include a section on the future use of the Environmental Footprint method.

Introduction

In 2013, the European Commission adopted the Product and Organisation Environmental Footprint (PEF and OEF) methods, suggesting public and private organisations to use them for measuring and communicating the life cycle environmental performance of products and organisations[1].

In adopting this Recommendation, the objective of the European Commission was to overcome the fragmentation of the internal market as regards different available methods for measuring environmental performance.

Based on the methods, the European Commission started a pilot phase in order to test:

- the development of product group and sector-specific calculation rules (Product Environmental Footprint Category Rules and Organisation Environmental Footprint Sector Rules) through a process open to any stakeholder;
- the development of benchmarks: this corresponds to the environmental performance of the average product/ organisation on the market and is the starting point for comparing between similar products and organisations;

- approaches to verify Environmental Footprint information;
- approaches to communicate Environmental Footprint information to consumers and to other company stakeholders (e.g. business partners, investors, NGOs, etc.).

The aim of the rules is to provide a clear set of instructions for calculating the Environmental Footprint profile that guarantees reproducibility and comparability between similar products (the benchmarking of organisations is more complicated and requires very specific situations in order to be meaningful). They are based on the principle of relevance: the rules pre-define the environmental issues that are most relevant for the given product group or sector and ensure that the quality of the analysis on these issues is best.

The pilot phase involved 24 product groups[2] and two sectors[3], with more than 260 leading companies and other stakeholders. Most of the pilots represented more than 2/3 of the EU market for the given product or sector. More than 2000 stakeholders followed the process and several of them took the opportunity to comment on milestone documents of the pilots.

A technical evaluation of the pilots has confirmed the importance of having clear product group and sector-specific rules. A comparison of environmental performance proved to be feasible for final products: it is possible to determine whether the performance of a product is better or worse than the average product on the market (benchmark)[4].

This became possible due to the agreements on technical issues reached during the pilot phase (e.g. modelling of cattle, packaging, end of life/ recycling/ recovery, etc.) and to the use of a single set of high quality secondary data. As a further action to enhance access to the methods, these data are going to be made available for free to any user of the product group and sector-specific rules until 2020.

The testing of verification approaches suggested a combination between on-site and remote audits and a focus on data that have most impact on the final results, which are mostly data owned by the companies [5].

A wide range of tests were also carried out by the pilot participants and the European Commission on how to communicate Environmental Footprint information. Many of the tests re-confirmed a high interest in environmental information in general, and Environmental Footprint information specifically. The issues to tackle include the difficult balance between complete and accurate information on the one hand and a need for simplicity and clarity on the other[6].

The European Commission is currently evaluating potential ways forward for the application of the PEF and OEF in existing or new policies. This public consultation aims to gather views on possible options for the further use of these methods and to collect evidence and opinions on underlying issues related to environmental information and green markets.

Potential policy options could include the integration of the Environmental Footprint methods into existing voluntary policies such as the EU Ecolabel and Green Public Procurement; or the development of a new, stand-alone instrument implementing the methods. The tool also has the potential to support the implementation of the Action Plan on Sustainable Finance. Among the potential applications, it is possible

to envisage a role for the PEF and the OEF to help define a taxonomy for sustainable finance (i.e. a classification of sustainable economic activities)[7] and as a basis for developing low carbon benchmarks and positive carbon impact benchmarks[8].

More background on the environmental footprint can be found in the document below.

[Background_EF.pdf](#)

[1] European Commission Recommendation 2013/179/EU, <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32013H0179>

[2] Batteries and accumulators, decorative paints, hot and cold water supply pipes, household detergents, intermediate paper product, IT equipment – storage, leather, metal sheets, footwear, photovoltaic electricity generation, thermal insulation, t-shirts, uninterruptible power supply, beer, dairy, feed for food-producing animals, olive oil, packed water, pasta, pet food and wine.

[3] Copper production and retail.

[4] See a detailed analysis in the document "Technical evaluation of the EU Environmental Footprint pilot phase, http://ec.europa.eu/environment/eusssd/smgp/pdf/HD_pilot_eval_final.pdf (document available only in English)

[5] Final report on the testing of verification approaches during the Environmental Footprint pilot phase, http://ec.europa.eu/environment/eusssd/smgp/pdf/2017_EY_finalrep_verification_public.pdf (document available only in English)

[6] F Final report on the assessment of different communication vehicles Ofr providing Environmental Footprint information, http://ec.europa.eu/environment/eusssd/smgp/pdf/2018_pilotphase_commreport.pdf

[7] See the proposal for a Regulation on the establishment of a framework to facilitate sustainable investment, COM(2018) 353 final

[8] See the proposal for a Regulation amending Regulation (EU) 2016/1011 on low carbon benchmarks and positive carbon impact benchmarks, COM(2018) 355 final

A. Information on the respondent

* I am giving my contribution as

Business association

* Please provide your full name.

150 character(s) maximum

Duvielguerbigny Arnaud

* Please provide your e-mail address.

duvielguerbigny@pu-europe.eu

If responding on behalf of an organisation, association, authority, company, or body, please provide the name.

150 character(s) maximum

PU Europe

* Where are you based?

Belgium

*** Publication privacy settings**

The Commission will publish the responses to this targeted consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication.

Please note that, whatever option chosen, your answers may be subject to a request for public access to documents under Regulation (EC) N° 1049/2001. Please also read the specific privacy statement referred to on the consultation webpage.

Please also read the specific privacy statement which can be downloaded below.

[Consultations_ps_en.pdf](#)

*** Is your organisation or institution registered in the EU Transparency Register? (relevant for companies, industry organisations, NGOs, consumer groups, research organisations and other).**

- Yes
- No
- Do not know

*** Please provide your Register ID number. Click below to view the EU Transparency Register: <http://ec.europa.eu/transparencyregister/public/consultation/search.do?locale=en&reset=>**

300 character(s) maximum

27993486325-38

*** Organisation size**

Micro (1 to 9 employees)

*** Please specify the type of product your organisation produces or represents**

- Intermediate product (e.g. ingredient for a final product)
- Final product (used as is)
- Both intermediate and final products
- Other (e.g. services)
- Not applicable

*** Please specify the sector(s) (multiple answers possible).**

- Agriculture
- Apparel & footwear
- Chemicals

- Construction products
- Electrical & electronics
- Food and beverages
- Materials (e.g. metals, plastics)
- Retail & wholesale
- Banking
- Insurance
- Tourism
- Other

*Where are you active?

- Local market
- Regional market
- National market
- EU market
- Worldwide market

*Does your company/organisation have at least one person with explicit responsibility for environmental concerns?

- Yes
- No

*Are you a member of a sectoral association?

- Yes
- No
- Not applicable

*How would you describe your commitment to environmental issues (you can choose several options, if applicable)?

- Environmental considerations are the main driver of the business (e.g. specialised in environmentally friendly products)
- Environmental performance and remuneration policy are linked
- The company knows the environmental performance of its products/ of the organisation, and strives to improve it
- The company knows environmental issues in the supply chain and strives to improve them
- The company gathers information on environmental performance
- The company has an environmental policy
- The company has an environmental management system
- Environmental issues are not important for my company
- Not applicable

*Environmental efforts in your company focus on...

- Products
- The company (e.g. production processes, catering, employee travel and commuting)
- Both the products and the company
- Not applicable

B. Questionnaire on the Future use of Environmental Footprint

B.1. Input on the importance of environmental information

To what extent do you agree with the following statements in terms of environmental information on products and organisations?

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
* There are too many methods on the environmental performance of products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are too many labels on the environmental performance of products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are too many methods on measuring companies' environmental performance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* There are too many reporting initiatives on the environmental performance of companies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Companies should apply environmental criteria when choosing their suppliers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Companies should measure their environmental performance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Not enough information is available on the environmental performance of products / organisations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I prefer to work with financial institutions (e.g. banks) that have a good environmental reputation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Investors and banks should apply environmental criteria when deciding where to invest	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* I think consumers care more and more for environmental performance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What importance do you give to the following types of environmental information on products?

	Very important	Quite important	Less important	Not important	No opinion
* Information directly linked to the product (e.g. environmental impacts of ingredients, packaging, energy use etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Production type (e.g. organic, covered by environmental management system)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information considering all environmental impacts of the product during its whole life cycle (resources, manufacturing, transport, use, waste or recycling, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Information on a single relevant environmental issue (e.g. climate change)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* The most relevant environmental impacts for the product (those cumulatively contributing to 80% of the total impact)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Information on the environmental performance of the product in comparison to the performance of the average product on the EU market (e.g. better, average, worse)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Information pointing to environmentally excellent products, so as to choose the best products (e.g. through ecolabels such as the EU Ecolabel)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

B.2. Input on experience with environmental information

Misleading green claims

* Did you ever encounter a label or environmental information that you would qualify as misleading?

- Yes
 No

* In my experience...

- ... most of the environmental claims are false
 ... many environmental claims are false
 ... some environmental claims are false
 ... environmental claims are correct
 I don't have an opinion

Comments (if you have an idea of what % of environmental claims are false, please add it here)

300 character(s) maximum

* Do you think that the availability of reliable, comparable environmental information would trigger more growth on green markets?

- Yes
- No
- I don't know

* In your experience, do companies with a sound environmental strategy perform better economically?

- Yes
- No
- I don't know

* Do you think your clients would be ready to pay more for a green product if green claims were more reliable?

- Yes
- No
- I don't know

* In your opinion, which sectors have the highest potential of growth for products with better environmental performance? (multiple answers possible)

- Agriculture
- Apparel & footwear
- Banking
- Chemicals
- Construction products
- Electrical & electronics
- Forestry
- Food and beverages
- Insurance
- Materials (e.g. metals, plastics)
- Retail & wholesale
- Tourism
- Other

* Please specify other.

150 character(s) maximum

An analysis could be carried by Commission to identify where an uptake of "green" products would make a meaningful contribution (using CBA principles)

* Do you experience growing demand from your customers for greener products?

- Yes
- No
- Don't know

* Are you able to satisfy the demand for greener products?

- You are able to satisfy the demand
- You have products that match this demand, but cannot provide them in sufficient quantities
- You do not have products that match this demand, but plan to introduce them

- You do not have products that match this demand, and do not plan to introduce them
- You do not see demand for greener products
- Not applicable

* Which labels or certifications are you using? (multiple answers possible)

- EU Ecolabel
- Other ecolabels (e.g. Nordic Swan, Blue Angel, etc.)
- EU Energy label
- Sustainable forestry (e.g. FSC)
- Sustainable fisheries (e.g. MSC)
- EU organic label
- Fair trade
- Company-specific claim
- Other
- Not applicable

* Which environmental performance measurement methods do you apply? (Examples of environmental performance measurement methods include Life Cycle Assessment based on ISO 14044, Greenhouse Gas Protocol, water footprint, Global Reporting Initiative indicators, Eco-Management and Audit Scheme indicators, etc.)

300 character(s) maximum

The PU thermal insulation industry supports the use of EPDs, environmental product declarations, issued according to EN 15804 and ISO 14044.

* In which environmental initiatives do you participate? (Examples of environmental initiatives include Carbon Disclosure Project, Global Reporting Initiative, The Sustainability Consortium, Sustainable Apparel Coalition, etc.). Please mention *not applicable* in case not relevant for your situation.

300 character(s) maximum

not applicable

* Could you state the costs for your business of applying these methods and using these initiatives? Please mention *not applicable* in case not relevant for your situation.

150 character(s) maximum

not applicable

* What is the reason to apply the methods and/or using initiatives?

- My clients are interested
- It helps me improve the environmental performance of the product or organisation
- To better manage my suppliers
- To reduce costs
- To show my commitment towards stakeholders
- I expect that the market of greener products in my sector will grow
- Other
- Not applicable

* Please specify other.

150 character(s) maximum

EPDs of thermal insulation products are used in building assessment methods.

* Do your clients ask questions about the labelled products? (e.g. what aspects the labels cover)

- Yes
- No
- I don't know
- Doesn't apply to my case

* Do you require environmental information from your suppliers?

- Yes, I require specific certification/ label/ method
- Yes, I require environmental information, but I don't specify what should be the content
- No
- Not applicable

* Which of the statements apply to you as SME? (multiple answers possible)

- Clients ask environmental data from me
- We produce products with environmental features (e.g. eco-labelled, "A" energy class products, organic label, recyclable, reused, cradle-to-cradle)
- We plan to produce products with environmental features
- Not applicable

* Do you think your clients are satisfied with the environmental information you provide?

- Yes
- Partially
- No
- I don't provide information

Please explain what would clients like to see in your opinion.

300 character(s) maximum

While PU Europe does not have any client as such, we have issued "generic" European EPDs for certain PU products. It has been reported to us and increasing use of EPDs by the construction sector

B.3. Use of the Product and Organisation Environmental Footprint methods (PEF and OEF)

* Please select the statement(s) that applies to you. (multiple answers possible)

- I (or my organisation) was member of one of the Technical Secretariats developing Product Environmental Footprint Category Rules or Organisation Environmental Footprint Sector Rules during the EU Environmental Footprint Pilot phase
- I (or my organisation) followed the EU Environmental Footprint pilot phase as a stakeholder
- I am aware of the EU Environmental Footprint pilot phase but was not involved
- I know about Life Cycle Assessment

I am not aware of this work

* Did you apply the PEF or OEF method?

- Yes, PEF
- Yes, OEF
- We are considering to apply it
- No

* Why not? (multiple answers possible)

- Waiting for the revised methods after the Environmental Footprint pilot phase
- There are no Product Environmental Footprint Category Rules or Organisation Environmental Footprint for my product/ sector
- Waiting for policies applying the methods
- Will apply only if required by legislation
- Already apply other method
- It is not of interest for my company

The Product Environmental Footprint method has new features respectively to traditional Life Cycle Assessment. Please tell us to what extent you consider these useful or not.

	Very useful	Quite useful	Neutral	Less useful	Not useful at all
* Product Environmental Footprint Category Rules pre-identify most relevant environmental impacts, processes and life cycle stages for the product group	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Primary data gathering is focussed on a limited number of specific processes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Data quality requirements vary based on environmental relevance and access to data	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Product Environmental Footprint Category Rules list secondary data to be used	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Secondary data are available for free to users of Product Environmental Footprint Category Rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The environmental performance of the average product on the market (representative product/ benchmark) is stated in the Product Environmental Footprint Category Rules	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is possible to compare the Environmental Footprint profile of the product with the benchmark	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

B.4. Input on the potential use of the Product and Organisation Environmental Footprint (PEF and OEF) methods for providing environmental information

Who should have an important role in ensuring the availability of reliable environmental information on products and organisations?

	Very important	Quite important	Less important	Not important	No opinion
* European Union	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States (countries)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* NGOs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Private sector	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

How important do you rate the following elements for providing reliable, comparable and comprehensive environmental information?

	Very important	Quite important	Less important	Not important	No opinion
* Product group and sector-specific calculation rules (e.g. how to calculate the environmental performance of clothing)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Availability of a benchmark (performance of the average product) per product group	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Availability of a metric that allows to compare companies' environmental performance within a sector	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Clear rules on how to develop product group and sector-specific calculation rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring the gathering of primary data for specifically defined processes that are most relevant from an environmental point of view and where primary data can be accessed	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Availability of common, free average (secondary) data	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Calculation tools enabling non-experts to carry out the analysis	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Use of a solid verification system	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Who should develop EU-wide product group and sector-specific rules?

	Best	Good	Less appropriate	Worse	No opinion
* The private sector, with input from stakeholders	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The private sector, supervised by the European Commission and with input from stakeholders	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Standardisation organisations (e.g. European Committee for Standardisation), based on EU rules	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The European Commission, with input from the private sector and other stakeholders	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Who should bear the cost of providing free average (secondary) data to use in Environmental Footprint measurement?

	Best	Good	Less appropriate	Worse	No opinion
* The European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The private sector	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Co-funded by the European Commission and the private sector	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* It is not important to provide free secondary data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

What actions related to the Product Environmental Footprint method (PEF) would be effective to trigger the uses of environmental information you consider important?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
* The European Commission encourages the use of the Environmental Footprint methods for measuring and communicating environmental information on a voluntary basis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Delegate the management of a voluntary Environmental Footprint scheme to a 3rd party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Prescribe the use of the PEF in case communicating environmental information (it is not mandatory to communicate environmental information, but if communicated, the information has to rely on the PEF method)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Prescribe the use of the PEF for measuring and communicating life cycle environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use the PEF in the development of EU Ecolabel criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use PEF benchmarks (performance of the average product) as thresholds to access the EU Ecolabel scheme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use PEF information to demonstrate compliance with the EU Taxonomy of Sustainable Investments.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use PEF for defining Green Public Procurement criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use PEF benchmarks as thresholds for accessing Green Public Procurement	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use PEF information to check the accuracy of environmental claims when applying the Unfair Commercial Practices Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Provide requirements on how to communicate on the Environmental Footprint (it is not mandatory to communicate environmental information, but if communicated, these have to comply with specific requirements)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Create an EU repository of PEF results for products (participation voluntary or mandatory depending on the policy)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify other.

300 character(s) maximum

the PU thermal insulation industry supports the use of EPDs as the most important vehicle for sharing environmental information. EPDs (EN 15804 is being amended) should take some of the principles of the PEF methodology.

What actions related to the Organisation Environmental Footprint method (OEF) would be effective to trigger the uses of environmental information you consider important?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion

* The European Commission encourages the use of the Environmental Footprint methods for measuring and communicating environmental information on a voluntary basis	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Delegate the management of a voluntary Environmental Footprint scheme to a 3rd party	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Use OEF indicators in the EU Eco-Management and Audit scheme (EMAS) reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Promote more harmonised reporting based on (but not limited to) the OEF for the environmental pillar of non-financial reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Provide an EU registry of OEF results for companies (participation voluntary or mandatory depending on the policy)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Create an EU rating scheme for environmental performance of companies, based on (but not limited to) the OEF	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Do you think there should be specific provisions for SMEs? (multiple answers possible)

- Micro companies should be exempted from legislative requirements
- Calculation tools for non-experts should be available
- No specific provisions are necessary
- Other

Please specify who should develop these calculation tools?

	Best	Good	Less appropriate	Worse	No opinion
* The European Commission	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Public administrations, coordinated by the European Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Sectoral/trade associations	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Individual businesses (free market of tools)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

* Do you think that the European Commission should work on specific strategic sectors?

- Yes, based on potential environmental impact

- Yes, based on importance for the EU economy
- Yes, based on importance for capital markets (e.g. market capitalisation of a sector) and/or financial stability
- Yes, based on a combination of factors (environmental impact and importance for the EU economy)
- The decision should be left to industry
- I don't know/ no opinion

* Do you think that the scope of the EU Ecolabel should be extended to food, feed and drinks?

- Yes
- No
- I am not sure

* Please explain your choice.

300 character(s) maximum

It is not PU Europe policy to comment on other sectors

What communication requirements related to environmental information would be most effective in your opinion for products?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
* Defining and monitoring compliance with communication principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Fines for breaching communication principles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Prescribe minimum information content, without prescribing the format	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Prescribe a format for communicating to consumers (to use e.g. on a label, on-shelf information, online etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Prescribe a format for communicating to business partners	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Encourage to transfer PEF information along the supply chain (e.g. through barcodes)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Mandatory verification (communicating information is voluntary, verification is mandatory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Which of the following approaches to verification should be used with reference to information produced based on PEF/OEF methods?

	Strongly disagree	Moderately disagree	Moderately agree	Strongly agree	Don't know /No opinion
* No need for verification, self-declarations are sufficient	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Member States should be responsible for monitoring that the information communicated complies with the requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* An independent third party (whose costs are covered by who is producing the information) should verify the information meets requirements before it is communicated	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* Where should Product Environmental Footprint information on products be available?

- Only directly on the product (e.g. on a label)
- Near the product (e.g. on shelf, leaflet provided with the product)
- Only online (e.g. linked to the product with a QR code or barcode)
- On or near the product and online
- Other
- No opinion

What communication requirements would be most effective in your opinion for organisations (e.g. companies)?

	Very effective	Effective	Slightly effective	Not effective at all	No opinion
* Prescribe minimum information content, without prescribing the format	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Prescribe a reporting format	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide any further comments, explanations or suggestions (for example other measures to improve the availability and comparability of environmental information).

PU Europe is the voice of the polyurethane (PUR / PIR) thermal insulation industry. Our members manufacture and CE mark products according to the CPR (Construction Products Regulation) and national building codes.

important note: Our answers to the present questionnaire disregard questions related to OEF and several ones on contractual relationship with clients of "green" products.

When it comes to thermal insulation products, it must be reminded that this construction product is only one material of a specific design: wall, floor, roof.... Therefore depending on the design, and irrespective of how "green" the product is, certain thermal insulation products might not be appropriate because this design requires a certain set of performance (weight, thickness, mechanical resistance...). the whole design of the system has to be thought through and a like for like comparison is usually not possible without rethinking the other elements of the building (together with construction techniques). This is why the PU insulation industry supports the use of EPDs developed by TC 350 that input an assessment at the building level (which assessment must take a LCA approach). It is critical that the work on the EN 15804 continues for the benefit of the many industries from the construction sector that having using them for years (and have invested significant resources to that end).

[Click here to upload a position paper.](#)

The maximum file size is 1 MB

Contact

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