

Template for comments and secretariat observations

Date:	Document: ISO/TC 207/SC 3 <b>N360</b>
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1	2	(3)	4	5	(6)	(7)
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ECOS	General comment		Ge	<p>This standard is a chimaera. It is supposed to become the standard to define one phenomenon of three. It is placed in a group. This is the third of three. Though, considering the levels of ambition of this standard and of the other two, it is questionable whether they should form a group at all. All of three are voluntary and is supposed to deal with “environmental aspects”.</p> <p>The minimum level required for transparency, external control and validity is too low to match the impression a reader of the text gets from the introduction. And it is too low for building credibility in the market-place and in the view of policy-makers.</p> <p>A standard that nobody will buy because “expensive” functions like certification has been removed, is too costly to any producer.</p>		
ECOS	Introduction	2 <sup>nd</sup> bullet	te	According to the general comment above: In order to not mislead the reader, delete “independently” in the phrase.	<p>“Such declarations are:</p> <p>...</p> <p>-based on <del>independently</del> verified Life Cycle Assessment (LCA) data, Life Cycle Inventory analysis (LCI) data or information modules in accordance with the ISO 14040 series of standards and additional environmental information;...”</p>	
ECOS	1	2 <sup>nd</sup> para	Ed	To give good information to the reader, add that business to consumer-application is available under certain restrictions.	“Type III environmental declarations as described in this International Standard are primarily intended for use in business to business communication, but their use in business to consumer communication is not precluded, <u>though only if certain requirements are met.</u> ”	
ECOS	1	4 <sup>th</sup> para	Ed	Sector specific-ness is not only made over to other ISO-standards, but to the program operators. Why not inform about it in the introductory section on “scope”?		

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ECOS	3.1		Te	Split definition of environmental label and declaration – it is not the same in sense that is intended here. Also, the meaning of this definition is for ex.: <i>a label can be a label</i> . Though, a label is a claim. A declaration is “information” to be used for comparison, in order to facilitate rational decision-making to reduce the impact on environment. A statement <b>cannot</b> be a symbol unless the symbol expresses a position in relation to specific spectra.	<p>3.x <b>environmental label</b> claim which indicates environmental superiority of a product (3.11) <del>or service</del> in relation to the whole product group</p> <p>3.y <b>environmental declaration</b> claim which indicates the environmental aspects of a product (3.11) <del>or service</del></p> <p><del>NOTE An environmental label or declaration may take the form of a statement, symbol or graphic on a product or package label, in product literature, in technical bulletins, in advertising or in publicity, amongst other things.</del></p>	
ECOS	3.2		Te/Ed	This definition of Type III e.d. (environmental declaration) does not really apply, partly according to changes in the last rounds concerning additional information.	<p>3.2 Type III environmental declaration <del>quantified estimated</del> environmental data information for a product (3.11) using predetermined parameters <u>and additional environmental information. The quantified environmental information may be supplemented by other quantitative and qualitative environmental information.</u></p> <p><del>NOTE 1 The predetermined parameters are based on the ISO 14040 series of standards.</del></p> <p><del>NOTE 2 The quantified environmental data may be supplemented by other quantitative and qualitative environmental information.</del></p>	
ECOS	3.9		Ed	The value “objective” does not correspond to the functions in the standard.	3.9 verification confirmation, through the provision of <del>objective</del> evidence, that specified requirements have been fulfilled	

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ECOS	5.3			<p>The intention to actually estimate environmental impact of a product, or to be able to make comparisons of two alternatives, gave rise to the idea of compiling all stages, all aspects. Only then the comparison or estimation will be juste. If something is omitted, then the function will be lost and the impression it gives will be misleading. Any comparison will be unfair.</p> <p>In this section the principle of “life cycle” is expressed. First it states that “all aspects shall be taken into account”. Then that if an aspect “considered to be relevant” does not cover the whole life cycle it shall be “stated”. It shouldn’t be a T III ed if it is incomplete or at least the statement should be clear and in all information, right next to the numbers that is affected.</p> <p>Further down in the document, the state of having an incomplete life-cycle seems to become the norm.</p>	<p>If the aspects considered to be relevant do not cover the full life cycle then it <u>cannot become a Type III environmental declaration shall be clearly stated</u></p>	
ECOS	5.4	1 <sup>st</sup> para	Ed	<p>Even more typical than materials and parts to be object for modules, would be electricity, where all the life cycle stages occur within the gates of the producer, including byproducts, side-effects etc. Another example is transportation.</p> <p>Without energy, manufacturing, etcetera, it is difficult to see how parts and materials can become a <i>whole</i> product.</p>	<p>LCA-based data for <u>energy (electricity, transports etc.)</u>, materials and parts that are used in the manufacture or assembly of other products can be used to contribute to Type III environmental declarations for those other products. The LCA-based data for the <u>energy</u>, materials and parts then become information modules, which may represent a whole or a portion of the life cycle for those materials or parts.</p>	
ECOS	5.4	1 <sup>st</sup> para	Ed	<p>To add up to a whole life-cycle using modules, requires more than adjustment. This word is too weak. The information has to be complemented and modified.</p>	<p>provided the information modules are <u>complemented and modified adjusted</u> in accordance with the PCR for the product category. If the information modules combined to develop a Type III environmental declaration do not cover the full life cycle of the final product, then <u>it cannot become a Type III environmental declaration emissions shall be clearly stated and justified in the PCR document.</u></p>	

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ECOS	5.5	1 <sup>st</sup> para	Te	Compare with 6.2 in 14 024 concerning Type I ecolabelling. There it is in the organisation's own interest to check with interested parties and therefore it will be done in one way or another. When it comes to type III, there is no such natural driving force and hence even more important to secure.	The process of developing environmental labels and declarations <del>should</del> <u>shall</u> include an open, participatory consultation with interested parties. Reasonable efforts <del>should</del> <u>shall</u> be made to achieve a consensus throughout the process.	
ECOS	5.6	Note	Ed	The comparability-principle-section has been reduced which also reduces the credibility of the standard. Transparency doesn't provide comparability, but improve the qualities of the declaration. This covers system boundaries, all stages and aspects etc.  Lift the note to the main text. Completeness is crucial to comparability. Hiding it in a note gives the notion that someone is trying to hide it.	<del>NOTE</del> -Type III environmental declarations not based on a full LCA or based on different PCR <del>are examples of declarations that have limited comparability. Different PCR means differences in system boundaries, allocation principles and/or data quality requirements, which will produce different results in the end.</del>	
ECOS	5.8	2 <sup>nd</sup> bullet	Te	Relate to 5.3. To be a declaration, it needs to be complete. Reading this section, one gets the impression that it is not so important. It is interesting to read that this standard "allows use of relevant stages of the life cycle, provided necessary information is supplied".  The term "relevant" requires that <i>someone</i> decide. It is subjective.  Delete 2 <sup>nd</sup> bullet.	<del>use of relevant stages of the life cycle, provided necessary information is supplied (see 7.2.5);</del>	
ECOS	5.9			This section is changed, important parts of the transparency-principle is now missing.	Add:  The programme operator shall also:  - enable an understanding of the limitations of the supplied information due to for ex. features of system boundaries and allocation rules.  - ensure that Type III environmental declarations are valid, reliable and current and produced according to the PCR, this standard	

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					and the standards referred to here. - Ensure availability of the full LCAs and other information that the Type III environmental declarations are based on.	
ECOS	6.3			Along with publishing PCR and declarations, those involved in developing them should be presented. It is very important for making the program more transparent.	Add: - along with publishing the PCR documents and Type III environmental declarations, also publish organisations and persons (interested parties) involved in the process.	
ECOS	6.3			For comparability and transparency	Add: - if incomplete Type III environmental declarations are published, it shall be clearly stated how the omitted stages or aspects has been valuated at the level that the decisions has been made (PCR or declaration).	
ECOS	6.3			An important aspect that is also a responsibility of the programme operator is the different requirements of declarations used in B-B and in B-C. Add a bullet.	- ongoing monitoring who receives or uses the information or gets impression of the Type III environmental declarations within the program. If consumers are among them, secure that all requirements according to this standard are met.	
ECOS	6.4	8 <sup>th</sup> bullet	Te	In order to be able to reveal what the standard requires in terms of control, the users of the information has to be identified. If consumers are among them, it will be stricter.	Add bullet: - Consider the audience of the information of the declarations, then decide verification procedures.	
ECOS	6.7.1	f	Ed	Hazard assessment would be better information than risk assessment and thus better as an example of additional environmental info.  There is no bullet on biodiversity aspects!	f) rules on additional environmental information, including any methodological requirements (e.g. specifications on <u>risk hazard assessment, impact on biodiversity</u> ) are equivalent;	
ECOS	6.7.1	J	ed	This is one example of how the standard in the current state normalises towards incomplete life cycles. This is alarming. Change wording and place as c).	j)c) if the declaration is not based on a full LCA: <u>cannot become a Type III environmental declaration, information on which stages are not</u>	

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					considered	
ECOS	6.7.2	p	Ed	Hazard assessment would be better information than risk assessment and thus better as an example of additional environmental info.  There is no bullet on biodiversity aspects!	P rules on additional environmental information, including any methodological requirements (e.g. specifications on <u>risk hazard assessment, impact on biodiversity</u> etc.) are equivalent;	
ECOS	6.7.2	Last para	Te	Here again, normalisation of incomplete life-cycles. Who decides whether the stages are not significant? Some indication of what as a portion of the whole should be helpful to the user of the standard.		
ECOS	7.1	First para	ed	To make the text clearer	...are intended to facilitate comparison of the environmental attributes <u>of the whole life cycle</u> of products that meet equivalent functional requirements <u>using relevant methods or systems...</u>	
ECOS	7.1	Last para	te	We cannot find where the last sections has been moved. If it has been deleted it must be a mistake because it is detrimental to transparency.		
ECOS	7.2.1			Important to any user of declaration-information is validity. Giving information of when the different information-packages was produced, will be of some help.	Add:  - <u>date of when the underlying LCA, LCI etc. was made.</u>	
ECOS	7.2.1	l	te	To be of better use, information on chemical substances should be both the CAS-number and the denomination most commonly used nationally where the information will be used.	i) <u>content declaration covering materials and substances using terms known nationally for all contents and also CAS-numbers for chemicals...</u>	
ECOS	7.2.1		Te	To be more informative if the text as a whole is not changed.	Add a new bullet:  g) <u>if the declaration is not based on a full LCA: information on which stages are not considered.</u>	
ECOS	7.2.3	h	te	Hazard assessment would be better information than risk assessment and thus better as an example of additional	h) <u>hazard assessment covering both impact on human health and environment.</u>	

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				environmental info.	<u>human health and environment.</u>	
ECOS	7.2.3	a) 3.	Ed	To not forget consumption and end-of-life-stages.	...discussion on the relation between the potential environmental impact(s) and the location of the product system <u>also covering consumption and end-of-life stages.</u>	
ECOS	7.2.3		Te	Biodiversity is not mentioned anywhere in this section.	Add new bullet: <u>b) estimation of impact on biodiversity due to investment phase, running phase, consumption or the other life cycle stages. The estimation should refer to the state the environment was in/would be in without the activities due to the product system.</u>	
ECOS	7.2.3	J	Ed	Make a reference to waste-hierarchy in a standard (used to be called Töpfer-scale).	j) preferred waste management option for used products <u>using xxx scale.</u>	
ECOS	7.2.4	G	Ed	This might turn out to be a loophole unless defined somewhat stricter.	g) ... <del>an acknowledged trace contaminant or actual background level</del> <u>and measurable by the most sensitive methods.</u>	
ECOS	7.2.5	3 <sup>rd</sup> para	Te	There will be great risk of not taking important impacts into account using modules.	... <del>should shall</del> provide information, <u>when available</u> , about use and the end of life-stage.	
ECOS	7.3	First para	Te	It cannot be that the declaration is updated ONLY if it will reflect an improvement, but if it loses validity due to change in production system.	... <del>amend may does</del> occur, for example, as a result of <u>substantial improvements of the environmental performance-change in the product system.</u>	
ECOS	8.1.1	Last para	Ed	To be more informative.	Requirements <del>of 9.4</del> for verification (see 9.4) using Type III...	
ECOS	8.1.4	Second para	Te		... <del>be available to any person upon request</del> <u>published.</u>	
ECOS	8.1.2	Second para third bullet	Ed	To reflect the principles of this standard.	...PCR give a description of <u>all</u> the significant environmental aspects <u>related to the whole life cycle</u> of the product.	
ECOS	8.2.1			This section is unclear; it starts out talking about both "external" and "internal" and then, without any guidance it		

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				shifts to only be talking about "internal".		
ECOS	8.2.3		te	Environmental knowledge, more general than product-related, would most certain be necessary for a person to be able to review a PCR.	Add: <u>- good knowledge of the environmental issues in general.</u>	
ECOS	9.1	First para		To make the meaning of the para more clear.	...be developed for use in a business to business (B to B) communication <u>only</u> , there may be declarations intended <u>or partly intended</u> to provide...	
ECOS	9.2.1	Second para		These kinds of declarations are rather complicated for any user, and for non-professionals especially. Taking in such implications that the numbers don't give the whole truth is too much. Using declarations towards consumers, the life cycles need to be complete.	Type III environmental declarations shall be based on <del>a model</del> of a full life cycle of the product. <del>However, when.....environmental declaration.</del>	
ECOS	9.2.2			According to comment above, it is also important to not confuse buyers not being experts in this area. Using symbols on packages, advertising etc. will lead to misunderstanding, that a product that has some connection to a study or report means that its current environmental prestanda should be superior to products without this logo. Therefore, simple logos without communication what it really means cannot not be used in information that reaches consumers.	Add: Information that reaches consumers shall not use logos, unless it is in direct context of further information that will give a clear picture of what Type III environmental declaration is.	
ECOS	9.1			The programme operator also has a responsibility to monitor information, marketing, validity etc..	Add: It is the responsibility of the programme operator to establish necessary systems to monitor how all the Type III environmental declarations are marketed and informed about by the different actors. Also, whether it is valid in relation to the actual product and how it is composed, produced, transported etcetera.	

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ISO 14020: 3 Objective of environmental labels and declarations: The overall goal of environmental labels and declarations is, through communication of verifiable and accurate information, that is not misleading, on environmental aspects of products and services, to encourage the demand for and supply of those products and services that cause less stress on the environment, thereby stimulating the potential for market-driven continuous environmental improvement. 4.6 Principle 5 4.6.1: The development of environmental labels and declarations shall take into consideration all relevant aspects of the life cycle of the product.

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