

**Eurometaux and Eurofer call for a robust methodology to assess the environmental footprint of products and companies and offer active contribution to the test assessment (pilot projects) of metals containing products starting later this year
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Eurometaux and Eurofer support a life-cycle based footprinting assessment based on a robust methodology, harmonised at EU level and aligned internationally

The European Non-Ferrous and Ferrous Metals industries support the objective of moving towards more resource efficient production and consumption and believe that a sound and robust life-cycle based assessment of activities and products can provide useful information to improve resource efficiency.

Eurometaux and Eurofer support an integrated life cycle approach assessing the most relevant environmental impacts (as opposed to energy focused footprinting) as the basis for footprinting assessment, taking account of the whole life cycle of products, including the use phase and recycling. Eurometaux and Eurofer also support an EU-wide approach so as to avoid different approaches throughout Europe and support a strengthening of the international alignment of footprinting methodologies. Such alignment would reduce the overall cost of using such complex and somehow expensive tools.

The first critical step of life-cycle based footprinting consists in ensuring that the LC-based methodology and LC-based data are robust and harmonised. Eurometaux and Eurofer recommend a step-wise approach to ensure the robustness of the methodology, its practical applicability and the time needed to develop robust and consistent data bases. This is a necessary condition for consumers' trust in footprinting.

Once the robustness of the methodology is ensured, Eurometaux and Eurofer believe that any footprinting assessment should be based on this methodology so as to avoid reporting and comparing on different basis. Eurometaux however recommends that benchmarking and reporting remain voluntary.

The associations believe that ultimately footprinting may provide a useful benchmark against which products imported or produced in Europe can be assessed and in doing so can compete on equal footing. However, an environmental footprinting is only one aspect of the broader concept of sustainability.

Recycling needs to be properly considered in the methodology!

The footprinting methodology published by the Commission on 9th April considers recycling at end-of-life, but through the 50/50 approach (considering 50% of the benefits of the recycled content and 50% of the benefits of end-of-life recycling) it disadvantages end-of-life recycling as compared to incineration for energy recovery which is inconsistent with the EU waste hierarchy. As a matter of fact, the approach credits incineration for energy recovery with 100% while recycling at end-of-life is only credited at 50%.

The true and full benefits of recycling should be considered.

Buildings are a product group for which a life-cycle based methodology exists!

Provided the recycling benefits are properly considered at end of life, CEN/TC350 standards (EN 15804 and related standards including Module D) should be considered as the valid reference documents for the assessment of the environmental performances of buildings as it is specifically taking account of buildings specificities and needs. In the construction context, the product is the building, not the individual components!

Toxicity and ecotoxicity methodologies must take the specificities of metals into account

The footprinting methodology published by the Commission on 9th April considers human toxicity and ecotoxicity. There is no reliable methodology or model for the time being that can assess properly the potential impact for metals, especially regarding speciation, bioavailability and resilience time. This leads to inconsistent results (i.e. overestimated impacts for metals), inaccurate and misleading messages to the citizens / consumers. The ILCD handbook has recognised this lack in its report *Recommendations for Life Cycle Impact Assessment in the European context*. We believe that, especially in view of the existing methodological weaknesses benchmarking and reporting should be on a voluntary basis.

The non-ferrous and ferrous metals companies offer active contribution to the test cases for products containing metals

Many end products contain metals in small or larger quantities be it as a building, a vehicle, packaging, components or key elements. Non-ferrous and ferrous metals are rarely used as end products. The assessment of the metal components in the products that will be used for the test phase of the PEFCR should be based on sound data and good understanding of the metals specificities. **The non-ferrous and ferrous metals companies and their representative associations therefore are keen to contribute to the test cases and would like to offer pro-active contribution to the technical work to be started around November 2013. Eurometaux and Eurofer invite any stakeholder interested in such cooperation to contact the secretariats via carpentier@eurometaux.be and D.Croon@eurofer.be**

Eurometaux represents the European non-ferrous metals industry

- **The NF-metals industry is indispensable for modern society.** Thanks to their intrinsic properties – including durability and recyclability - non-ferrous metals are indispensable to meet essential societal needs and to build a low-carbon economy.
- **Non-ferrous metals contribute to the European - and global - creation of wealth and jobs:** they represent 2% of EU GDP and create **450,000 direct jobs and over 1 million indirect** jobs in Europe. Their use in high-tech and high added-value activities makes them very valuable to the EU's economy and competitiveness.
- **The NF-metals industry contributes to resource efficiency** by enhancing the in-use phase of products and also thanks to high recycling rates ranging between 30% and 95%, depending on the metals and their use. Primary and secondary raw materials are complementary, as secondary raw materials cannot on their own meet the growing needs of a sustainable economy.

Represented by **EUROFER, the European steel industry** is a world leader in its sector with direct employment of 350 thousand highly skilled people, producing on average 170 million tonnes of steel per year. More than 500 steel production and processing sites in 23 member states of the European Union provide direct and indirect employment and a living for millions of European citizens.

The European steel industry is the backbone of Europe's prosperity and an indispensable part of the European supply chain, developing and manufacturing thousands of different, innovative steel solutions. The industry provides the foundation for innovation, durability, CO2 reduction and energy savings in applications as varied and vital as automotive, construction, machinery, household goods, medical devices, and environmental technology. Being 100 per cent recyclable, steel also contributes significantly to the long-term conservation of the fundamental resources for future generations.