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**REPORT**  
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**Report to ISO/TC 207/SC 3**  
Prepared by ISO/TC 207/SC 3/WG 4

# 1 Introduction

## 1.1 Background

There are now three published International Standards and one Technical Report dealing with aspects of environmental labels and declarations. The question now arises as to whether work should commence to develop the Technical Report into a full International Standard and this report deals with that issue. The existing standards cover the following:

- ISO 14020 sets out general principles relevant to all environmental labels and declarations
- ISO 14021 sets out requirements for self-declared environmental labels and declarations, applied and substantiated by producers of goods and services (Type II environmental labelling)
- ISO 14024 sets out principles and procedures on the development of pass/fail, third party, "seal of approval" environmental labelling schemes (Type I environmental labelling)

The Technical Report (ISO/TR 14025) addresses Type III environmental declarations. These are not dealt with in any other existing standard although the general principles in ISO 14020 do apply. Existing environmental labelling standards are not specifically designed to enable comparisons to be made on environmental grounds by purchasers. One of the valuable characteristics of Type III environmental declarations is the provision of a broader spread of quantified environmental life-cycle information in a standardised way, making meaningful comparisons possible.

Since discussion of a Type III environmental declaration standard began in 1994, there have been multiple developments. Appendix 1 summarises international, national and sectorial activities involving Type III environmental declarations. This appendix provides information that should be considered in determining the possible impacts of either withdrawing ISO/TR 14025 or progressing the document to a standard.

## 1.2 Purpose of the report

The purpose of this report is to meet Resolution 7/2001 taken at the ISO/TC 207/SC 3 meeting in Kuala Lumpur, Malaysia:

### **Resolution 7/2001**

*ISO/TC 207/SC 3 decides to defer a decision on the future of ISO/TR 14025 until the 2002 plenary and to give WG 4 the following new mandate:*

*The working group is requested to continue the work to identify the gaps and additional needs in ISO/TR 14025 and the framework document (Doc ISO/TC 207/SC 3/WG 4 N8) which would have to be addressed before a generic standard could be developed and to develop a report for circulation to SC 3 prior to the 2002 Plenary meeting, proposing how these gaps can be filled using information from existing Type III activities.*

*ISO/TC 207/SC 3 recommends that the Convener and Secretary communicate with WG 4 members and resolve issues by mail and/or electronic means as much as possible in order to maximize participation and minimize cost.*

## 1.3 Content

This report provides

- An overview of gaps and additional needs, caused by lack of experience or disagreements at the time of publishing ISO/TR 14025, which would have to be addressed before a generic standard could be developed. (Chapter 2)
- A summary of the consensus achieved with respect to the previously identified gaps and additional needs. (Chapter 3)
- The conclusion reached (Chapter 4)
- A summary of ongoing activities and developments of Type III environmental declarations (Appendix 1)

## 2 Identification of gaps and additional needs

An inventory was made in preparation for the WG 4 meeting in Johannesburg in June 2002, by consulting all nominated WG 4 experts, in order to identify gaps and additional needs based on the comments given. Comments were received from

- Argentina
- Austria
- Germany
- France
- Switzerland
- Sweden

The comments were compiled and on the basis of those and the discussion during the first day of the WG 4 meeting in Johannesburg three gaps were identified.

- Business to Business (B2B) and Business to Consumer (B2C).
- The process around “consultation with interested parties”
- Independent verification

All the above identified gaps were addressed at the WG 4 meeting in Johannesburg, including participants from:

- |                  |             |                |
|------------------|-------------|----------------|
| - Argentina      | - Finland   | - Mexico       |
| - Australia      | - France    | - Norway       |
| - Botswana       | - Germany   | - South Africa |
| - Brazil         | - Indonesia | - Sweden       |
| - Canada         | - Italy     | - Switzerland  |
| - China          | - Japan     | - Thailand     |
| - Czech Republic | - Korea     | - UK           |
| - Denmark        | - Malaysia  | - USA          |

### **3 Consensus achieved**

The experts at the WG 4 meeting achieved consensus on the following issues that will have to be taken into account in the event that ISO TR 14025 moves into a standardisation process.

#### **3.1 Business to Business (B2B) and Business to Consumer (B2C)**

Recognising that Type III environmental declarations, like other types of environmental labels and declarations are market driven, WG 4 considers that it will be up to the market places to create the demand for the type of Type III environmental declarations, whether it is a B2B or B2C type of declaration.

Given the current market situation, it would seem appropriate that this kind of declaration is most suitable for B2B transactions. However, in developing any future standard WG 4 believes it is important to retain the flexibility, such that we would not specifically exclude the needs of B2C transactions.

#### **3.2 The process around “consultation with interested parties”.**

WG 4 recognises that Type III declarations may be developed by a wide variety of businesses or organisations and that the consultation process with interested parties will require flexibility; therefore WG 4 considers that a standard for Type III environmental declarations needs to comply with principle of ISO 14020.

*“The process of developing environmental labels and declarations should include an open, participatory consultation with interested parties. Reasonable efforts should be made to achieve a consensus throughout the process”*

### **3.3 Independent verification**

WG 4 recognises that the data used for Type III environmental declarations should be generated according to the ISO 14040 series and must be accurate and applicable for comparison. WG 4 agreed that the data must be independently verified either internally or externally. This could, but does not necessarily, mean third party verification.

### **3.4 Previous methodology gap**

In addition to the three consensus solutions above, the outstanding issues between SC 3 and SC 5 were resolved in conjunction with the Kuala Lumpur meeting 2001. See below SC 3 resolution:

#### **Resolution 6/2001**

*ISO/TC 207/SC 3 thanks the chairman of ISO/TC 207/SC 5 for attending the meeting and informing the meeting that a method of resolving the outstanding issues between SC 3 and SC 5, relating to comparative assertions and alternative methodologies, has been defined.*

## **4 Conclusion**

WG 4 has achieved broad consensus on the gaps that it was asked to identify and address, according to SC3 Resolution 7/2001.

It should be recognised that not all issues associated with Type III environmental declarations have been solved at this stage. The process of standardisation itself would facilitate their resolution. This report is therefore commended to SC 3, as background information for a future letter ballot on ISO/TR 14025.

## **Appendix 1: Ongoing activities and developments**

### **Emergence of Type III environmental declarations**

The importance of the environment as a competitive factor has gradually increased since the Rio Earth Summit in 1992. The first “wave” of environmental management tools was mostly site specific (ISO 14001 etc.). The second “wave” is more directed to the product chain. One reason, among others, is the increasing requirement for suppliers in the product chain to document their environmental performance (products and sites) due to a mix of a government push and market push. Another reason is the fast growing trend of using the Internet as a provider of environmental data between companies in the product chain. It makes it easier for those who demand environmental information and puts pressure on those who have to supply the information. Additionally, the development of LCA methodology through standards has for the present come to an end, and the UNEP/SETAC Life-cycle initiative has just been launched. The initiative will especially be beneficial for the developing countries.

The above is also the main reason for the gradually emergence of Type III declarations during the last seven years and it also explains the sector approach from ISO TC 59 on building products.

As product chains do not respect borders, the “end user” will be able to influence all companies in the product chain, whether they are located in developing countries or not. Many companies therefore see Environmental Declarations as posing a threat or risk that they might be disconnected from “their” product chain.

The challenge will be to establish a general principle and framework for Type III Environmental Declarations in order to bridge the gap between all actors in product chains.

Since the ISO/TC 207 meeting in Kuala Lumpur 2001, further progress in terms of developing new declaration schemes, developing guidelines and preparing decisions concerning the future for Environmental Declarations at regional and local levels, has been taking place.

### **UNEP/SETAC – Life Cycle**

UNEP/SETAC –Life Cycle launched a Life-Cycle Initiative in April 2002. The mission of the Life Cycle Initiative is to "develop and disseminate practical tools for evaluating the opportunities, risks, and trade-offs, associated with products over their whole life cycle". The UNEP/SETAC Life-Cycle Initiative aims to foster life cycle thinking around the world through the development of an international life cycle management framework, project-specific activities and databases of best available life-cycle assessment (LCA) methods and data.

## **GEDnet**

The purposes of GEDnet are to encourage exchange of information and experiences between practising parties and to discuss key issues in developing programs. The current participants are from Canada, Denmark, Germany, Italy, Japan, Norway, Republic of South Korea, and Sweden. The main activities are:

- To discuss the basis for procedures of Type III environmental declarations
- To discuss the practical application of LCA methodology
- To create information platform of Type III environmental declarations (guidebook, web page, PSR comparison etc.)
- To provide theoretical and practical information for private/public, national/international organisations

GEDnet has developed an “International guide to environmental declaration of products”. A draft of the guide was presented and distributed at the workshop on Environmental Declaration in Johannesburg. GEDnet has appointed one expert to WG 4, due to their Liaison A status achieved at the SC 3 meeting in Kuala Lumpur. GEDnet has furthermore spent much time and effort on disseminating information around the world on Environmental Declaration. GEDnet intends to achieve mutual recognition between Type III programs in the near future.

The main activities are only briefly described in this report. To keep updated on events, it is recommended to follow the news on the GEDnet web page, <http://www.environdec.com/GEDNet/>.

## **Building construction**

ISO/TC 59/SC 3/WG 12 – Sustainability, had a meeting on 15/16 March 2002 in Noosa, Australia. The group is currently working on five standards, one of which is “Building and constructed assets – sustainable building – environmental declaration of building products”. A third Working Draft (ISO/TC 59/SC 3 N 468) was compiled after the meeting.

The group has discussed the co-ordination with ISO/TC 207 and has proposed the following liaisons to co-ordinate the work:

Mr S.O. Ryding liaises with ISO/TC 59/SC 3/WG 12 and ISO/TC 207/SC 5

Mr S Hissbag liaises with ISO/TC 59/SC 3/WG 12 and ISO/TC 207/SC 3

Mr S Fossdal liaises with ISO/TC 59/SC 3/WG 12 and ISO/TC 207/SC 3/WG 4

## **Asian workshops**

Asian collaboration of Type III was begun in 2002. LCA experts from several countries took part in a first workshop. The workshop was supported by Japan Environmental Management Association for Industry (JEMAI). The objectives were:

- To demonstrate the significance of eco-labels
- To provide general concepts and framework regarding Type III
- To present information regarding implementation of existing Type III programs
- To discuss possibilities for the development of Type III eco-labels in Asian countries

Some of the key issues were identified during the workshop:

- Most countries are still in the phase of introducing systems for eco-labelling Type I and Type II.
- How to overcome barriers in establishing Type III programs in terms of technical aspect, administrative aspect, and awareness issue
- Financial problems
- Lack of experts; researchers, staff in companies
- Users (Consumers) education

JEMAI plans to set up an Asian wide interrelationship initiative regarding Type III environmental declarations, providing training, workshops, and partnerships.

### **The European Commission**

In February 2001 the European Commission adopted a Green Paper on Integrated Product Policy. This discussed possible options for developing an Integrated Product Policy (IPP) at the European level, including potential tools. Environmental product declarations were cited briefly, with the remark that, "There may be a need for European co-operation in support of their use".

As part of the stakeholder consultations on the Green Paper the Commission organised, on 16th May 2001, an expert workshop to discuss environmental product declarations (EPD) in more detail. Following this workshop, and taking into account stakeholders' comments on the Green Paper, the Commission awarded a study contract to Environmental Resources Management Ltd in November 2001 to:

- (1) Document and evaluate existing EPD systems (both national and industry);
- (2) Compare them with each other and current ISO TR 14025;
- (3) Examine possible future direction for EPD systems in Europe; and
- (4) Examine how best EPD systems should be integrated with other IPP tools.

Following the production of the draft Interim Report covering points (1) and (2) above an expert workshop was held on 22<sup>nd</sup> April 2002 to discuss these results. There was also limited discussion about points (3) and (4), which served to assist the consultants in drawing up the final report. In this report the consultants are required to consider the desirability of the Commission undertaking one of the following three options:

- Doing nothing;
- Supporting existing national, sectorial or other international initiatives;
- Developing a European scheme.

The final report is due this summer.

The desk officer responsible for the study in the European Commission has agreed to keep the convenor of WG4 informed of the results of this study and any follow-up measures that the Commission will undertake. Further information on the development of IPP can be found on [www.europa.eu.int/comm/environment/ipp](http://www.europa.eu.int/comm/environment/ipp) .