

Product Environmental Footprint pilots: Batteries

PEFCR public consultation August/Sept 2016

Comments from DG ENV - European Commission

Date:

19/09/20

16

Author	0	1	2	3	4	5	6	7
	Com me nt nu m ber	refer ence to chap ter/ anne x num ber	Paragr aph/fig ure/ta ble	page number	comment	proposed change	com ment er	action/answer to comment
DG ENV - European Commission	1				The chapter "introduction" is missing. Some information is mentioned in the introduction of the chapter 1.	Consider to include a chapter on "introduction"		Accepted, add introduction chapter
DG ENV - European Commission	2	1.1		12	Only organisations are listed, not specific contact persons. They are mentioned just after the front page.	Add specific contact persons in Table 1-1 or consider to merge the two tables		Accepted, contact persons added
DG ENV - European Commission	3	1.3		14	Date of expiration and publication are missing.	Provide the date of publication and the date of expiration of the final PEFCR		Accepted, completed
DG ENV - European Commission	4	2.3		15	some references are listed in this section	Consider to move this references to the list of references at the end of the PEFCR.		Accepted, references moved to parag. 10
DG ENV - European Commission	5	3.4		17	PEFCR refers to guidance v5.1 instead of 5.2	Change the version and adapt the PEFCR to be in line with the latest version 5.2.		accepted, done
DG ENV - European Commission	6	3.1		17	information on the PEFCR review panel are missing.	Provide details on PEFCR review panel.		Accepted, to be completed
DG ENV - European Commission	7	3.2		17	Review requirements for the PEFCR are missing in the document.	Add the review requirements for the PEFCR in the final PEFCR		accepted, added
DG ENV - European Commission	8	4.1		18	This chapter includes more information than those strictly related to the FU (eg. About scope of the	Consider to review the content of the chapter, leaving in this section only the information strictly related to the FU and to		accepted, done

				PEFCR, system boundaries, product classification...)	move the other information to more appropriate sections. This would improve the readability of the PEFCR.		
DG ENV - European Commission	9	4.2		21	There is more information in this chapter than only the one related to RP.	Consider to review the content of the chapter. For example, from "when the precise usage" to the end of the sentence: this sentence can be relevant for the modelling of the use stage and you can consider to move it to a more appropriate section such as 5.6.	accepted, done
DG ENV - European Commission	10	4.5		30	the most robust impact categories are selected as relevant. Note that the document refers to 14 environmental impact instead of 15.	clarify in this section that the PEF studies have to calculate all the 15 impact categories and then decide to communicate only on the ones selected as most relevant. Refers to 15 impact categories, instead of 14.	accepted, done
DG ENV - European Commission	11	4.5		31	sentence from "nevertheless, Will be provided"	since the supporting studies are over, remove this sentence.	accepted, done
DG ENV - European Commission	12	5	table 5.1	36	Cross reference is missing in Table 5.1 "Default data in 0 shall be used"	Update the cross reference in this table and check the validity and correctness of cross references throughout all the document.	accepted, clarified
DG ENV - European Commission	13	5.6		44	regarding the use stage, the PEFCR does not mention product-dependent and product-independent processes. It is not stated if the main function approach or the delta approach has been applied. It is not indicated whether results of the use stage should be reported separately.	In the Final PEFCR, please apply the requirements of the use stage issue paper or clearly justify why you have decided not to be compliant	accepted, paragraph explanation modified.
DG ENV - European Commission	14	5.4		43	The following sentence is mentioned : "A new PEF for communication purpose shall be considered only if the user is in situation 1 for at least one of the foreground processes, or is using significantly different	Please, clarify better the meaning of this sentence in the PEFCR	accepted, paragraph explanation modified.

				activity data when compared to the reference product or existing published PEF.”			
DG ENV - European Commission	15	6	48	The following sentence is mentioned : “In all cases, the uncertainty of the results shall be assessed (see chapter 7). No benchmark conclusion shall be communicated in case the difference between the calculated impacts is lower than the uncertainty assessed.”	No information on how to assess is mentioned in chapter 7.		accepted, to be reviewed
DG ENV - European Commission	16	1.5	14	The disclaimer on the English version that supersedes translated version in case of conflicts is missing.	Add the disclaimer: " the original in English supersedes translated versions in case of conflicts"		accepted, done
DG ENV - European Commission	17	4.1	18	It is not clearly stated in the PEFCR the number of the sub-categories foreseen by the PEFCR and which are the sub-categories.	Please, state clearly in the PEFCR the list of sub-categories that has been identified: if three as the bullet points in this section or four as the representative products in the screening study.		accepted, done
DG ENV - European Commission	18	1	12	This comment refers also to other sections in the PEFCR. The charger is included in the case of ICT and cordless, but the charging station is excluded for electric vehicles since it is considered to be part of the infrastructure and not part of the battery.	For a certain percentage the charger is always dedicated to the battery. For e-mobility a certain percentage of the charger should be allocated to the battery as well. Consider to modify this point.		Not accepted, to be reviewed: It is not a technical decision whether the charger for e-mobility can be included in the system boundaries or not: it is clearly a part of the infrastructure (it's manufacturing design and implementation do not depend mainly on the battery or vehicle manufacturer), and it's usage

							depends on the individual user practice during the use phase of the vehicle. For clarity and simplicity reasons, as well as limitation of interpretation, it is proposed to exclude the charger in all cases of the category of products.
DG ENV - European Commission	19	4.4.1	Figure 4.2	25	The charger is missing in the figure with the system boundaries	Include the charger in the figure with the system boundaries, clarifying in which life cycle it shall be included.	Not accepted, the charger is already indicated. Charger inclusion specified in parag 4.4.2
DG ENV - European Commission	20	4.4.1	Figure 4.2	25	the figure shows the foreground and background processes.	Usually, the identification of foreground and background processes is study-specific since it depends on the availability of data for the specific company. Please, clarify this aspect in the PEFCR. Identify clearly in the figure with the system boundaries the processes for which primary data are required. If the word "foreground" is used to identify the processes for which primary data are required, this should be specified better in the PEFCR.	accepted, to be reviewed
DG ENV - European Commission	21	4.6	table 4.6	32	the table lists three impact categories that can be calculated additionally	All the impact categories shall be calculated and only some of them shall be used for the communication. This information are included in section 4.5. In section 4.6. You can list all the additional environmental information that you consider as relevant for your product category, however this information should not refer to LCA based information and therefore should not include other impact categories.	accepte, clarification with the guidance for these 3 impacts categories.

DG ENV - European Commission	22	4.6		32	No information is provided on the relevance of biodiversity.	As agreed at TAB level, each pilot shall assess the relevance of biodiversity. The PEFCR shall specify if biodiversity is relevant or not. If relevant, guidelines shall be provided on how to assess and communicate.	accepted, done
DG ENV - European Commission	23	4.7		32	this section contains a lot of information that seems not to be appropriate for this section	Please, reconsider the content of this section including only the assumptions and limitations related to PEF studies done in accordance with this PEFCR	accepted, done
DG ENV - European Commission	24	4.7		32	about the use of averaged industry datasets.	The final PEFCR shall provide the exact secondary data to be used in the calculation of the PEF profile to avoid differences in PEF studies stemming from the use of different secondary data. For all final PEFCRs, secondary data shall be those provided for free by the Commission or created by the TS and provided in the PEFCR. In case a secondary dataset is not available among those provided by the Commission, then you can apply the procedure reported in the Guidance to deal with this. (see also comment 35 on this)	accepted, paragraph modified
DG ENV - European Commission	25	5		35	The PEFCR reports that "PEF studies shall identify the most relevant impact categories, life cycle stages, processes and elementary flows	This was a requirement for supporting studies, but is not foreseen to have it valid also for PEF studies in general. The PEFCR may specify this further requirement for PEF study, however we suggest you to reconsider this decision since the procedure to be applied is complex and can discourage the adoption of the PEFCR, especially for SMEs.	accepted, paragraph modified
DG ENV - European Commission	26	5.1	table 5.1	36	The table does not specify for which processes company specific data shall be collected.	the PEFCR shall include the list of processes for which primary data shall be collected. Consider to specify these processes in this table or to include the list somewhere else in the PEFCR	accepted, reference to paragraph 5.4
DG ENV - European Commission	27			37	sections from 5.1.1 to 5.1.5 should be included in the PEFCR only if it is required to PEF		accepted, paragraph deleted

				studies to apply ANNEX D of the Guidance as an additional requirement. (see also comment 25)			
DG ENV - European Commission	28	5.2		38	Point 1) lists the processes included in the foreground system, but for these processes both primary data (if available) or activity data used in the screening can be used	Clarify which is the list of processes for which primary data shall be used. Only the processes for which primary data are used can be defined as foreground.	accepted, reference to paragraph 5.4
DG ENV - European Commission	29				The PEFCR mentions "activity data used in the screening"	Please, check if all the activity data used in the screening that can be used as default data by PEF studies are included in the PEFCR. This can improve the easiness of use of the PEFCR.	accepted, done
DG ENV - European Commission	30	5.2		38	The list of data quality criteria shall be the one included in the last version of the call for tender (preferred option, but not mandatory) or to the content of the guidance v 5.2 (mandatory), not to the PEF guide	please, update this section referring either to the last version of the call for tender (preferred option, however not mandatory) or to the content of the guidance v. 5,2.	accepted, done
DG ENV - European Commission	31	5.2		38	There is a reference to table 12-18, however this table is not included in the document	Please, check the number of the table you are referring to.	accepted, done
DG ENV - European Commission	32	5.3.2		40	the dataset for electricity that shall be used is listed	Consider to update the default dataset to be used to model electricity choosing among those provided for free from the commission.	accepted to be reviewed
DG ENV - European Commission	33	5.3.3		40	collection rate reported in table 5-9 shall be used	There is an inconsistency between the text (that indicates the use of default values) and the fig. 4.5 that classify as foreground this process. Please, remove this inconsistency in the PEFCR.	accepted to be reviewed
DG ENV - European Commission	34	5.3.3		40	The PEFCR states "assumptions about electricity mix and water consumption presented in chapter 5.3.3 are applicable to the end of life stage"	Please, check if the reference to section 5.3.3 is a mistake.	accepted, done

35	5.4		40	<p>From "when available, "to "...and reported in the PEF documentation".</p>	<p>Clarify the meaning of the first sentence and the difference between sector-specific generic data and multi-sector generic data. In any case, please consider that the final PEFCR shall provide the exact secondary data to be used in the calculation of the PEF profile to avoid differences in PEF studies stemming from the use of different secondary data. For all final PEFCRs, secondary data shall be those provided for free by the Commission or created by the TS and provided in the PEFCR. In case a secondary dataset is not available among those provided by the Commission, then you can apply the procedure reported in the Guidance to deal with this. A possible text that can be included in the PEFCR about this aspect is reported below: "The secondary datasets to be used are those listed in the PEFCR. Whenever a dataset needed to calculate the PEF-profile is not among those listed , then the applicant shall verify if the same PEF-compliant datasets if freely available in one of the Life Cycle Data Network nodes created in the context of the environmental footprint pilot phase LCI tendering process. If that is not the case, then the applicant shall choose between the following two options (not in hierarchical order) :</p> <ul style="list-style-type: none"> • To use the same PEF-compliant datasets if available in a free or commercial source not part of a Life Cycle Data Network node created in the context of the environmental footprint pilot phase LCI tendering process; • To use another PEF-compliant dataset existing either in one of the Life Cycle Data Network nodes created in the context of the environmental footprint 	<p>[extended the column to see more text]</p>	<p>accepted, done</p>
----	-----	--	----	--	--	---	-----------------------

					pilot phase LCI tendering process or in a free or commercial source dataset and considered to be a good proxy for the missing dataset.		
DG ENV - European Commission	36	5.4	table 5.4	41	Guidance is given also for the calculation of the DQR for "precision"	It is suggested to remove the column on "precision" from the table since this criterion does not need to be recalculated. The same comment applies also to table 5-5.	not accepted, comment added
DG ENV - European Commission	37	5.5		44	No data gaps are reported and no indications on potential proxies to be used in case of missing datasets are included.	Consider to provide a more precise guidance on how to identify proxies. In annex IX some materials are classified as "estimate". If for these materials proxies are used, these should be reported clearly in the PEFCR and this section can be adequate. (eg. Graphite powder, manganese sulphate)	accepted, done
DG ENV - European Commission	38	5.6		45	there is a reference to sections 4.4.2 and 4.2.	Please, check if the reference to this two sections is correct	accepted, done
DG ENV - European Commission	39	5.8		46	The geographical validity of the data reported in table 5-9 is missing	Consider to add the geographic validity for the data reported in the Table 5-9	accepted, both climate change indicators are specified.
DG ENV - European Commission	40	4.5		30	Climate change is selected as most relevant. The modelling option for climate change, biogenic is not indicated. Climate change is selected as most relevant, however the PEFCR does not	Align the PEFCR to the requirements of the biogenic carbon issue paper specifying whether the different sub-indicators shall be reported in the PEF studies and report the modelling option for climate change, biogenic in the PEFCR.	accepted, Europe is specified

				specify whether the different sub-indicators shall be reported in PEF studies.			
DG ENV - European Commission	41	6	48	Benchmarks values are not included	Include benchmark values in this section		accepted, table of value provided.
DG ENV - European Commission	42	6	48	(first bullet point) The section reports "it is recommended to consider equivalent databases, use phase scenario and EOL scenario in order to achieve an accurate and meaningful benchmark	This is a "shall" requirement. PEF studies done in accordance with this PEFCR shall use the default datasets specified in the PEFCR, the use phase and the EOL scenario. No deviations are allowed.		accepted, text modified
DG ENV - European Commission	43	6	48	(second bullet point) It is not allowed to communicate on a single indicator	Communication shall cover at least 3 impact categories. Modify this point in the PEFCR		To be reviewed by the PEFCR: propose 3 climate indicators, for global environmental impact (avoiding possible local unfair benchmark) and ILCD quality level 1: IPCC global warming, excl biogenic carbon, Ozone depletion, WMO model, ReCiPe, and IPCC global warming, incl biogenic carbon.
DG ENV - European Commission	44	6	48	(third bullet point) the meaning of this sentence is not clear	Please, clarify the meaning of this sentence		accepted, text modified

DG ENV - European Commission	45	7		49	Some references to the possibility of comparing the performances of similar products are reported throughout the document. The instructions on how to use PEF study results and the description of the uncertainties common to the product category are not included in this section	Consider to collect all the references already included in the PEFCR concerning the comparability of the performances of similar products and include all of them in this section Please, add the missing points.	accepted, paragraph completed
DG ENV - European Commission	46	10		60	There is a reference to the guidance v. 4.0 and to the guidance v. 5.2	In the PEFCR refer only to the last version of the guidance (only to v. 5.2)	accepted, done
DG ENV - European Commission	47	12.2		64	Only the list of the supporting studies is included in this section	Please provide an executive summary, not only the list of the supporting studies.	?
DG ENV - European Commission	48	12.6		64	There is a reference to guidance v. 4	Refer to guidance v. 5.2	accepted, done
DG ENV - European Commission	49	12.7		64	There is a reference to guidance v. 4	Refer to guidance v. 5.2	accepted, done
DG ENV - European Commission	50	12.9	table 12-7	72	Table 12-7. datasets from PE for energy and transport are listed	Consider to update this section referring to the datasets for energy and transport provided for free by the EC.	accepted, to be reviewed
DG ENV - European Commission	51				The default dataset to be used for modelling the charger seems to be missing	check if the default dataset to be used to model the charger in the PEFCR is included.	accepted, to be reviewed
DG ENV - European Commission	52	8.8		58	the PEFCR mentions the use of a single indicator for the PEF label in B2C communication and the global warming excl. biogenic carbon has been selected as indicator	It is not allowed to communicate only on one mid-point indicator, please modify this section accordingly	see comment 43
DG ENV - European Commission	53	12.13		79	This section is taken from the guidance	Consider to remove it from the PEFCR since it is already included in the guidance.	accepted, to be reviewed
DG ENV - European Commission	54	12.14		84	the table contains the criterion on "methodological appropriateness and consistency" instead of the criterion on "Implementation of	update the table accordingly.	accepted, to be reviewed

				the End of life formula" required by the guidance 5.2 and the last call for tender			
1	4.1		19	<p>We appreciate that the document does not cover lead batteries and their applications. However the wording does not clearly cover the applications excluded. We would request you add some qualification text to make this clear, and to avoid any confusion in the future</p>	<p>Please re-word as follows: Stationary power stations, back-up power systems (for train, aircrafts, UPS, etc.): the main function is the service time of the back-up availability. The unit of analysis is not the total energy delivered, but total lifetime of the installation. In addition, for many of the stationary applications, the weight of the battery is not a key factor so a high specific energy is not required</p> <p>Starting-lighting-ignition (SLI) batteries, start stop and micro- and mild hybrid batteries: These batteries provide a range of functionality including providing high power for a short period of time required to start a vehicle. Start-stop and micro- and mild-hybrid batteries also power a range of electronic, electrical and safety features in a vehicle. The unit of analysis for these batteries is the energy delivered at the required power level.</p> <p>Batteries with different expected quality and/or additional function (for example forklift batteries are selected for their total energy over lifetime, but a counterweight is often used in the application as an additional function). The maximum specific energy, which is clearly a major characteristic of the function definition in our scope, is one of many requirements for these applications. Consequently, batteries used in applications such as forklifts, golf carts, wheelchairs, etc. will not be considered in this study.</p>	<p>Alistair Davidson-Advanced Lead Acid Battery Consortium</p>	<p>accepted, text modified according most of the proposed changes.</p>

ALABC	2	4.1	19	Please could you clearly state that any future PEF for batteries listed in the excluded section should be conducted separately from this PEF.	Please add the following text for clarification: Any future PEF for the batteries and applications listed below should be developed separately from the PEF described in this document.	Alistair Davidson-Advanced Lead Acid Battery Consortium	accepted, sentence added.
ALABC	3	6	48	it is clear from the document that any benchmarking should only cover applications listed in this document. However, please can you add some clarification text to ensure that this PEF is not misused for comparison and benchmarking with batteries outside the scope of this PEF.	Please add: Benchmarking should not be conducted for any applications excluded from this PEF detailed in Section 4 (page 19) e.g. benchmarking should not be conducted with lead batteries.	Alistair Davidson-Advanced Lead Acid Battery Consortium	not accepted: the exclusions have been defined based on the service provided (functional unit), not based on the chemistry.
EEB	1		13	No NGO or consumer representative in the Technical Secretariat. General drawback in the PEF project to keep some stakeholders out of the technical work. Only option is open consulting where many choices are taken and the rationale behind not transparent.		European Environmental Bureau (EEB), Kim Christiansen	not accepted: no stakeholder has been kept out of the technical work. EEB has never asked to be involved in our pilot. Nevertheless, It is recognised that the large number of studies in parallel has created a difficulty for ONG's to be part of all the pilots
EEB	2	3.1	17	No information available on the composition of the review panel or the results of the review.	There should be a public consultation after the review.	European Environmental Bureau (EEB), Kim Christiansen	accepted: the review panel will completed as soon as available.

EEB	3	4.1	18	How can the unit of analysis be Wh of Wh? Unitless? See also page 19 on reference flow. There is a misunderstanding on the functional unit and the reference flows - plural as they are the scaled inputs and outputs of in principle all unit processes needed to deliver the final outcome - the functional unit. The kg of battery shall be included in the definition of the functional unit.	Better definition or further clarifications/ justifications needed	Euro pean Envir onme ntal Bure au (EEB) , Kim Christ ianse n	Accepted: text modified to clarify the definition of the F.U in kWh.
EEB	3	4.1	19	By excluding the application, the major influence on the service life, the consumer behaviour, is excluded from the PEF. So it has no use to B2C.	Clarify the expected use of the PEF	Euro pean Envir onme ntal Bure au (EEB) , Kim Christ ianse n	Accepted: modification of the text, placed in parag 4.1, to avoid misinterpretation of the meaning of "application".
EEB	4	4.1.5	20	"Please see detail in paragraph 5.6 the use stage calculation for the battery system." - so application is not excluded?	explain what is in and what is out	Euro pean Envir onme ntal Bure au (EEB) , Kim Christ ianse n	Accepted: clarification that the PEFCR is applying the "delta approach" for the use phase.
EEB	5	4.2	21	"When the precise usage conditions are not available for the organization..."	as above	Euro pean Envir onme ntal Bure au (EEB) , Kim Christ ianse n	accepted: explanation and reference to the table 5.8

EEB	6		48	Benchmarking not included.	Another public consultation needed. Any insights from the supporting studies should be shared.	European Environmental Bureau (EEB), Kim Christiansen	Not accepted: the T.S. is applying the development process required by the Commission, no other public consultation is required. Nevertheless, The T.S. is open to further review of the document with the stakeholders until the end of the development phase. Concerning the supporting studies, the decision about their confidentiality is depending on each company decision.
EEB	7	7	49/50	The ranking in ISO 14044 is an example and cannot be referenced as a normative source for ranking classes. ("Examples for the identification of significant issues")	thinkstep have to define their own criteria	European Environmental Bureau (EEB), Kim Christiansen	accepted, the criteria selected will be indicated as a result of the Technical Secretariat decision.
EEB	8	8.1	51	Uncertainty and sensitivity analysis are missing? Range of figures are missing. Reduces the credibility.		European Environmental Bureau (EEB), Kim Christiansen	accepted, to be reviewed: the result obtained in the sensitivity studies realized during the screening study is provided.
EEB	9	12.1 2	General 73-78	The tables on environmental hotspots are not self-explanatory.	Add an explanation of the colour code at the beginning.	European Environmental Bureau (EEB)	accepted, modified (or explained?)

								, Kim Christ ianse n	
EEB	10		Genera l		An annex listing the changes made in the PEFCR document due to the public consultation would be very helpfull. Also when it is very short.			Euro pean Envir onme ntal Bure au (EEB) , Kim Christ ianse n	to be reveiwed?
Bureau Veritas CODDE	1	4	Table 4-3	22-23	The assumptions related to transportation scenario are not clear concerning the active material and passive material: there is no reference to the distribution to Europe, but only to Korea or Japan	For all material, folow the same description than for the cell: "transport from Japan, Korea or China to Europe"		Etien ne Lees-Peras so / Bure au Verit as COD DE	Not accepted: explanatory note added at the bottom of the table 4.3
Bureau Veritas CODDE	2	5.1	Table 5-1	36	The table refers to situations 1, 2 and 3, while the situations are only defined later in the document (p.41)	For clarity purpose, move the situation definition before the table OR refer to the chapter		Etien ne Lees-Peras so / Bure au Verit as COD DE	accepted: reference to the chapter in a note
Bureau Veritas CODDE	3	5.1	Table 5-1	36	"Production of the main product" and "Use stage scenario": for situation 2 and 3 the table mention to refer to a chapter not existing (0)	Put the right link to the chapter		Etien ne Lees-Peras so / Bure au Verit as COD DE	accepted, done
Bureau Veritas CODDE	4	5.4	§4	40	"secondary data displayed in 0 are applicable"	Put the right link to the chapter		Etien ne Lees-Peras so / Bure au Verit as COD DE	accepted, done

Bureau Veritas CODDE	5	5.7	§1	46	To our own experience, logistic in indeed negligible, excepted in case of plane transportation, which can occur for many products containing batteries (mainly ICT). This logistic scheme is also only applicable for batteries manufactures in Europe, while some batteries are manufactured in other region (eg. Asia) and sold in Europe, increasing the risk of plane transport usage	Precise that in case of plane transport, it has to be assessed accordingly	Etienne Lees-Perasso / Bureau Veritas CODDE	accepted, note added
Bureau Veritas CODDE	6	5.7	§2	46	The assumptions related to transportation scenario are not clear concerning the active material and passive material: there is no reference to the distribution to Europe, but only to Korea or Japan	For all material, follow the same description than for the cell: "transport from Japan, Korea or China to Europe"	Etienne Lees-Perasso / Bureau Veritas CODDE	not accepted, explanatory comment in the text.
Bureau Veritas CODDE	7	5.8		46	To be updated following the outcome of the PEF EoL workshop		Etienne Lees-Perasso / Bureau Veritas CODDE	accepted
Belgium - Federal Public Service - Health, Food chain safety and Environment	1	General			Missing content in many chapters. Details are given below.	We would appreciate to receive a final document with no part to complete for this stakeholder consultation as it will not be possible anymore for stakeholders to address comments.	Belgium - Federal Public Service - Health, Food chain safety and Environment	accepted, work on completion

2	Annex II			No summary are available for the supporting studies	We would appreciate to have access to a summary with the major outcomes and if possible the adaptations made on the PEFCR	Belgium - Federal Public Service - Health, Food chain safety and Environment	The supporting studies have not been made public by the companies making them. The feedback of the changes made has been available to the Technical Secretariat through the Thinkstep
3	Communication			It is not yet clear which communication vehicles will be tested and which 3 impact categories will be communicated	We would appreciate to receive this type of information	Belgium - Federal Public Service - Health, Food chain safety and Environment	accepted, see comments DG Env. and updated version of PEFCR.
4	DNM			It seems to have a lack of guidelines how to proceed for some situations in the DNM : Situation 2 - Option 2 and Situation 1 - NR processes		Belgium - Federal Public Service - Health, Food chain safety and Environment	accepted. See also comment DG env. and updated version.
5	Issue papers			Some issues papers were not followed (or only partially) : biogenic carbon, biodiversity, use stage, electricity		Belgium - Federal Public Service - Health, Food chain	The TS has selected the most adapted solution for electricity. Biodiversity and Biogenic carbon have been demonstrated as without significant

						safety and Environment	impact in the screening studies.
6	Resource depletion - mineral and fossil			It is not clear if the resource depletion is selected or not and if yes, which LCIA method is recommend	We would appreciate to receive some clarification on this specific point	Belgium - Federal Public Service - Health, Food chain safety and Environment	The resource depletion is not selected, as it has been considered as not representative for metals.
7	Organizational boundary			Do we have to interpret foreground on Figures 4-x as organizational boundaries and so these processes are always in situation 1?		Belgium - Federal Public Service - Health, Food chain safety and Environment	The foreground and background situations have been clarified with reference to the DNM in the Figures 4-x.