

Genova, 15 dicembre 2006

Il Sistema Internazionale EPD®

Presentazione dei nuovi requisiti e
valorizzazione delle opportunità competitive

Primi commenti al documento:

***Overview of the revision work with:
“EPD® - an international EPD system for
environmental product declarations”***



ARPAT

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1. **Par. 3.1 Introduction of a new classification system for harmonisation of PCR documents**

CPC (Central Product Classification) is an UN-based system for statistical division of product categories and service types, which seems to be the best system to use for PCR structuration as it relates on supply chain/life cycle approach.

Comment

ISO 14025, introduction:

“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**. It is recognized that a developer of a Type III environmental declaration cannot precisely determine the audience. However, it is important to consider the **information needs** of different purchaser or user groups, for instance large businesses, small and medium sized enterprises (SMEs), **public procurement agencies** and consumers. Those **responsible** for developing Type III environmental declarations and programmes based on this International Standard **will need to pay due attention** to the **level of awareness of the target audience.**”

The european public authorities use the CPV, “Common Procurement Vocabulary”, as reference nomenclature for their procurement activities.

Directive 2004/18/EC – Coordination of procedures for the award of public works contracts, public supply contracts and public service contracts

(Directive 2004/17/EC – Coordinatiion of the procurement procedures of entities operating in the water, energy, transport and postal services sectors)

Article 35 (41)

...

“The product area shall be established by the contracting authorities by reference to the CPV nomenclature;”

The Annexes of the two Directives (Directive 2004/18/EC - Annex II; 2004/17/EC - Annex XVII) **don't indicate the comparison** between the **CPV** and the **CPC** nomenclature for the products category.

Therefore, **it may be useful to indicate** the way to compare the CPV and CPC nomenclature for the products into the classification system of the EPD[®] international system.

It may be useful to **include the comparison** (i.e. by a table of comparison) **into the PCR documents** (or to include the source of information to allow to the public procurers to make the comparison themselves).

2. *Par. 3.4 Introduction of “sector EPDs” for entire industrial branches*

Sector EPDs can not be used by single producers to communicate environmental performance of its own products. Consequently, sector EPDs can not be used in purchasing and procurement possibly being one of the main application of product-specific EPDs.

Comment

Sector EPDs may be used as reference/guidance for public procurers to have information about the general environmental performance of a product category.