



# ORGALIME POSITION PAPER ON

## EuP Methodology

Brussels, 27 April 2006

Following the publication of the final report on the EuP methodology study, Orgalime wishes to thank the Commission and the contractor of the above study for having considered most of its previously raised comments, questions and concerns. Moreover, Orgalime wishes to reassert its support to the establishment of such a methodology, which it considers as an appropriate instrument to help the Commission put into practice the eligibility criteria of the EuP directive (art. 15). Orgalime particularly welcomed the life cycle thinking and multi-criteria approaches (i.e. wide scope of environment impact categories) of the methodology, which will ensure the future political decisions will lead to the most benefit for the environment. The methodology will provide stakeholders with a known common basis for the next steps of the directive's implementation.

Though Orgalime understands that necessary adjustments can be made to update some data or to tune some environmental aspects to future scientific developments, or to needs and specificities of a particular product sector, Orgalime hopes that the methodology will not be significantly modified with respect to the core principles recalled above.

Nevertheless, Orgalime would like to draw the Commission's attention on very important remaining concerns regarding the future use of the methodology:

- Orgalime believes that the methodology as it stands should be used in a consistent manner during the upcoming preparatory studies whichever consultants carry out these studies.
- The methodology has to be clearly split from the case studies carried out during its development for strictly illustrative purposes. Consequently, the upcoming preparatory studies will have to be done from scratch. Results of calculation should in our view be used by the Commission, in full consultation of the future Consultation Forum to decide which environmental impacts are most significant for a given product group.
- Orgalime wishes to re-iterate that the methodology has been set up for the exclusive use and purpose of the Commission and the future Regulatory Committee and is neither aimed nor appropriate for use by individual companies, especially SMEs.
- Orgalime is still concerned about developments of other studies and initiatives ongoing parallel, which could appear conflicting with the EuP methodology, in particular the EPICT-ICT study, the EIPRO study, the creation of an LCA platform by the JRC, and the IPP pilot project on mobile phones, which neither necessarily follow the spirit nor the letter of the recently adopted EuP framework directive. Orgalime believes that all regulatory activity in this field must fully follow the principles and requirements set out in the EuP directive in order to be both relevant and coherent.
- Finally, Orgalime still wonders whether and how political decisions will take account of the notion of "not entailing excessive costs" included in Article 15 of the EUP directive. The proposed Life Cycle Cost should not necessarily be the most appropriate ranking option of relevant environment aspects for all product categories.