

LCA in an evolving regulatory landscape

EPD ISC 2025

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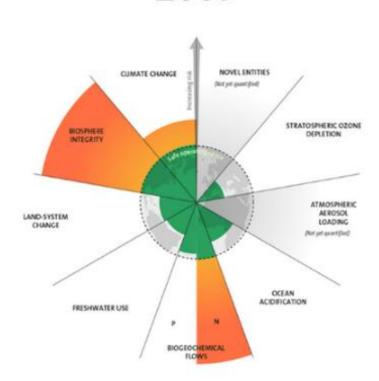




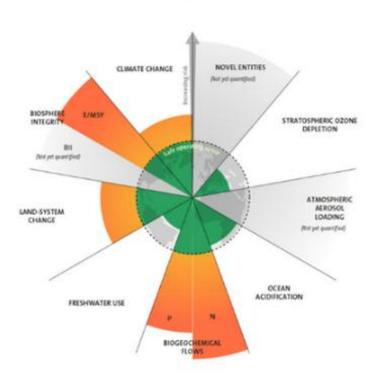
We live in times of multiple global crises



2009



7 boundaries assessed, 3 crossed 2015



7 boundaries assessed, 4 crossed 2023



9 boundaries assessed, 6 crossed







- Analysis (and reduction) of environmental impacts, trade-offs and burden-shifts
- Address other sustainability aspects
- Several uses
 - Eco-design and value chain management
 - Research & Innovation
 - Reporting/communication
 - Policy making

Life Cycle Assessment is (part of) the answer







Same Different results

EF METHODS

Impact assessme Modelling rules

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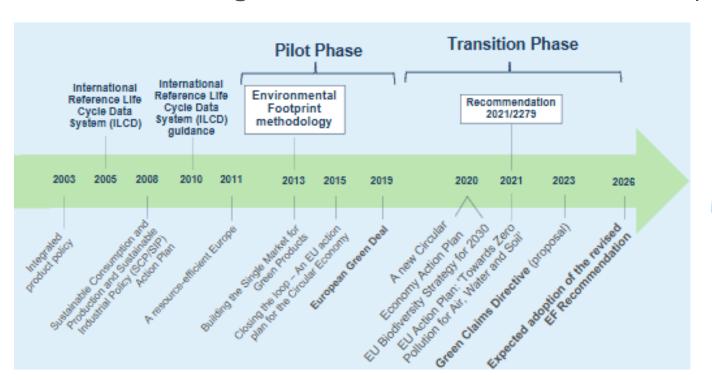
Environmental Footprint methods

• Recommendation (EU) 2021/2279 to harmonise LCA of products (PEF) and organisations (OEF) and make them fit-for-purpose

Consolidated multi-stakeholder processes

Broad application from agrifood to space

• Used for **EU legislation** on carbon/environmental footprint









New PEFCRs (in 2024-2025)

- 1. Aquaculture and marine fish
- 2. Apparel& Footwear
- 3. Cut Flowers and potted plants
- 4. Synthetic turf

Updated PEFCRs/OEFSRs (in 2024-2025)

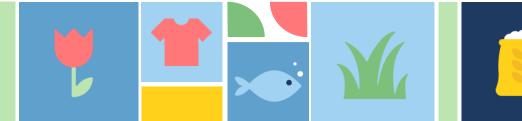
- 5. Beer
- 6. Copper (OEFSR)
- 7. Dairy products
- 8. Feed for food-producing animals
- 9. Pet food
- 10. Batteries (tbc)

Other PEFCRs (in 2026-2027):

- 11. Aircrafts, drones and VTOL (EASA, tbc)
- 12. Space (DEFIS)
- 13. Tourism (GROW)

"Shadow" PEFCRs:

- Developed by industry independently from EC
- Could be reference for further developments, incl. EF processes and policy uses















Critical raw

LCA, PEF)

Corporate sustainability due diligence (LCT)

materials (LCT, LCA, PEF)

Ecodesign (LCT,

European

Commission

LCA / LCT in EU policies

Batteries and waste batteries (LCT,LCA,PEF) ting (All) otecting water and marine resources (LCT,LCA,PEF) (2019-2024)

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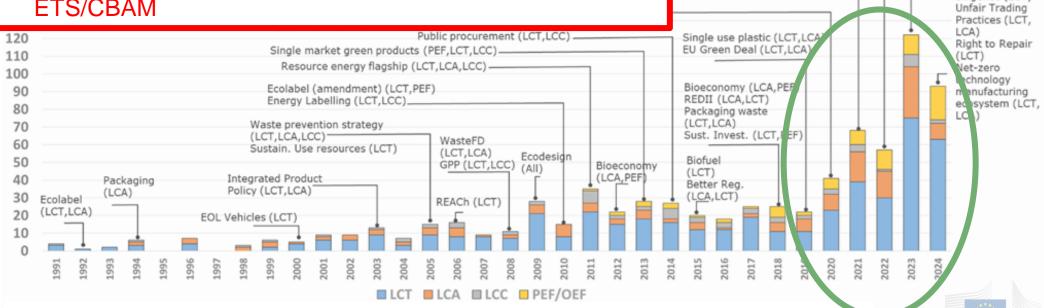
LCT, LCA, PEF

rective (LCA)

nitoring framework for circular economy (LCT,LCA,PEF)

Clean Industrial Deal (2025):

- Confirms relevance of comprehensive LCA methods (e.g. Batteries, CRMA, ESPR, CPR)
- Highlight simplification and harmonisation needs
- Start focusing on carbon accounting and integration with ETS/CBAM



Updated from Sala et al. (2021). The evolution of life cycle assessment in European policies over three decades. *The International Journal of Life Cycle Assessment*, 26, 2295-2314.



POLICY DEVELOPMENT

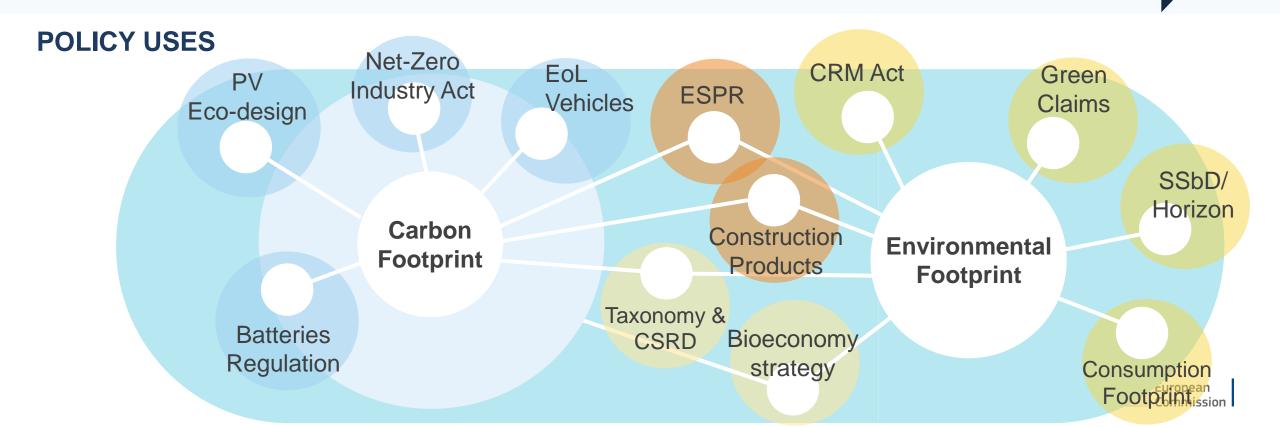
ANTICIPATION & PROBLEM DEFINITION

FORMULATION

IMPACT ASSESSMENT

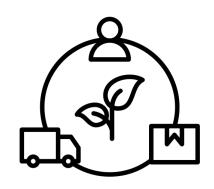
IMPLEMENTATION

EVALUATION



Ecodesign for Sustainable Products Regulation

- Entered into force in 2024
- LCA/EF as key tool for:
 - 1. Analysis and prioritisation of product groups
 - 2. Methodology for the analysis of impacts and hot-spots of product options
 - 3. Potential performance and information requirements
- Original MEErP complemented with EF and additional elements
- PCF building on EF, ETS and CBAM
- 2025-2030 Working Plan published in 2025:
 - Iron&steel (2026), Aluminium (2027)
 - Textiles (2027), tyres (2027), furniture (2028), mattresses (2029)
 - Repairability (2027), Recycled content and recyclability of EEE (2029)









Construction Product Regulation – EN15804

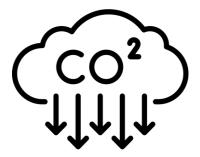
- Entered into force in 2025 and progressively replacing Reg. (EU) 305/2011
- Development of technical frameworks for declarations, requirements and information provision
- EN15804 as methodological reference for LCA/EPD
- Converging tracks to ensure consistency across products and materials
- Building block for CF under EPBD



ETS - CBAM

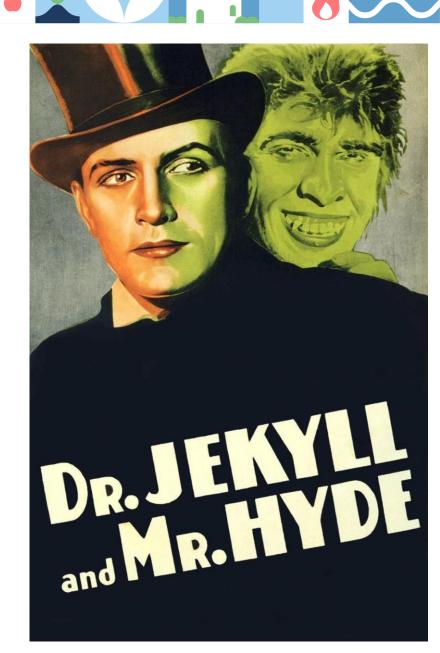
- As the EU raised its own climate ambition (e.g. via the Emission Trading System

 ETS), and as long as less stringent climate policies are deployed in other countries, there is a risk of 'carbon leakage' (i.e. EU production moved abroad, or EU products replaced by more carbon-intensive imports).
- Carbon Border Adjustment Mechanism (CBAM) applies to a large set of products when imported, transitional period until definitive in 2026
- LCT approach (currently under definition / refinement) implementing default values and reporting rules
- Accounts for selected Scope 1 and Scope 2 GHG emissions (Scope 3, partly)
- Expected to become reference for future policies on carbon footprint accounting, such as the Industrial Decarbonisation Accelerator Act:
 - Accelerate permitting for clean industrial projects.
 - Introduce voluntary EU-wide carbon labels, starting with sectors like steel, to help create lead markets for low-carbon products



LCA needs/challenges for policy making:

- 1 Fitness-for-purpose vs. limitations of LCA
- Data availability, reliability and reuse
- 3 Simplification vs. scientific complexity
- 4 Harmonisation: copy-paste vs. convergence







Strength, agility and flexibility needed





Priorities for the future of LCA/EF methods

- 1. Methodological developments to fulfill policy needs (e.g. Green Claims Directive proposal)
- Pursue coherence, consistency and harmonization (e.g. carbon footprint)
- 3. Mainstream the implementation
 - Address SMEs, use in EU policies and other applications
 - Provide rules, data, tools, training





- Review EF Recommendation
- EF datasets







Methodological developments



Climate Change



Ozon Depletion



Human toxicity, cancer



Human toxicity non-cancer



Particulate matter



lonizing radiation, human health



Photochemical ozone formation



Acidification



Eutrophication terrestrial



Land use



freshwater



Wateruse



marine



Resource use, minerals and metals



Ecotoxicity, freshwater



Resource use. fossils

Based on policy needs, scientific progress, in-house experience and external input, including:

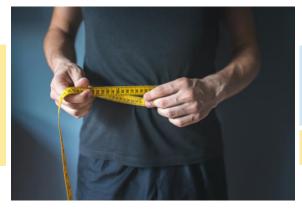
- Revision / update of existing midpoint impact categories (e.g. water, soil quality, resources, toxicity)
- "-1/+1" hybrid approach for biogenic C accounting
- New categories for **microplastics** and **biodiversity**
- Revision of **DQR and other modelling aspects** (e.g. EOL, circularity, agrifood, allocation, electricity, mass balance)
- Adjustment of normalization, weighting and aggregation
- Integration of **non-LCA information** (e.g. fish depletion)
- Setting the ground for **longer-term developments** (e.g. endpoint indicators, cLCA elements, link with PB)

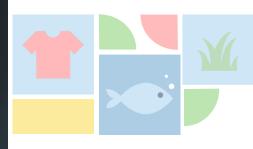




Mainstreaming EF/LCA

Reducing difficulties













- Simplification and harmonisation
- Text of EF Recommendation
- PEFCR/OEFSR
 - Streamline procedures (currently: ~M1€, 2.5 years)
 - Focus on folicy priorities (e.g. ESPR)
 - Umbrella and shadow PEFCRs

- Data
- Tools
- Training







The harmonisation challenge: LCA & carbon accounting in the EU

- Reproducing?
- Converging?
- One-size-fits-all?



Legislation (e.g. DAs)



ETS CBAM IDAA

PEFCRs/ OEFSRs

PCRs

Recommendation
EU 2021/2279 on EF EN15804
(PEF/OEF)

ISO 14040/44 (et al.) on Life Cycle Assessment



A vision on data



Multiple data points
(admin burdens, risk of inconsistencies)

Al-aided

- Data interoperability
- Integration
- Harmonisation



Future: one common database/network





- 2. What does "successful" mean? Accessible, good LCA needed
- 3. EU policy framework as global reference (e.g. ESPR, CPR, CBAM, Batteries) + other emerging players appearing
- Better carbon footprint today, or environmental footprint tomorrow?
- 5. Find balance of contrasting needs: harmonization, simplification, scientific coherence, operationality, political winds
- 6. Collaboration and exploitation of synergies is fundamental (e.g. data, PCRs)
- 7. LCA for sustainability, and peace?















"Hope is not the conviction that something will turn out well

but the certainty that something makes sense,

regardless of how well it turns out".

Vaclav Havel

(from the book "Radical Love", written by Satish Kumar)









THANK YOU!

ENV website: Environmental Footprint methods

JRC website: European Platform on LCA (EPLCA)

EF TAB: Register of Commission expert groups

Circular economy: Circular economy

Green claims: Green claims



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2024-2029 Commission's priorities

- 1. Sustainable prosperity and competitiveness
- 2. Defence and security
- 3. Supporting people and the social model
- 4. Quality of life: food security, water, nature
- 5. Protecting democracy and values
- 6. Global Europe: power and partnerships
- Delivering together & preparing for the future

LCA/LCT potential contribution

- Supports reducing waste, cost inefficiencies
 and impacts of products and organisations
 - Promotes environmental excellence and sustainable innovations and investments
 - Supports **resilience** of value chains (e.g. CRM)
 - Promote transparency, reliability and trust (e.g. green claims, data)
 - Supports fair trade agreements and leadership in sustainability
 - Breaks silos and helps monitor progress toward climate neutrality, circular economy, and resilience



Governance of EF methods & development of PEFCRs

TS





1 per PEFCR/OEFSR
Develops sector rules
Manages the project





Technical Advisory Board

+ Steering Group

Provides technical and policy advice for development and implementation of EF



European Commission

Guardian of the method Final decisions Support



Helpdesk

Provides technical support to stakeholders



Stakeholders

Follow developments Comment, Input on public consultations

European Commission



Potential data links

Work in progress

