



START2SEE
LIFE CYCLE ASSESSMENTS



Should capital goods be included in EPDs?

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About start2see



25 years experience in LCA and EPD across the building and construction sector in Australia and Europe (2014-current: EPD Australasia) (1999-2006: MRPI)

- First **LCA Certified Professional** in Australia
- First **approved EPD verifier** in Australia and New Zealand





This is a tale of methodology and standards being out of touch with life cycle inventory data (or vice versa)





What if...

We want to compare the age of the audience?

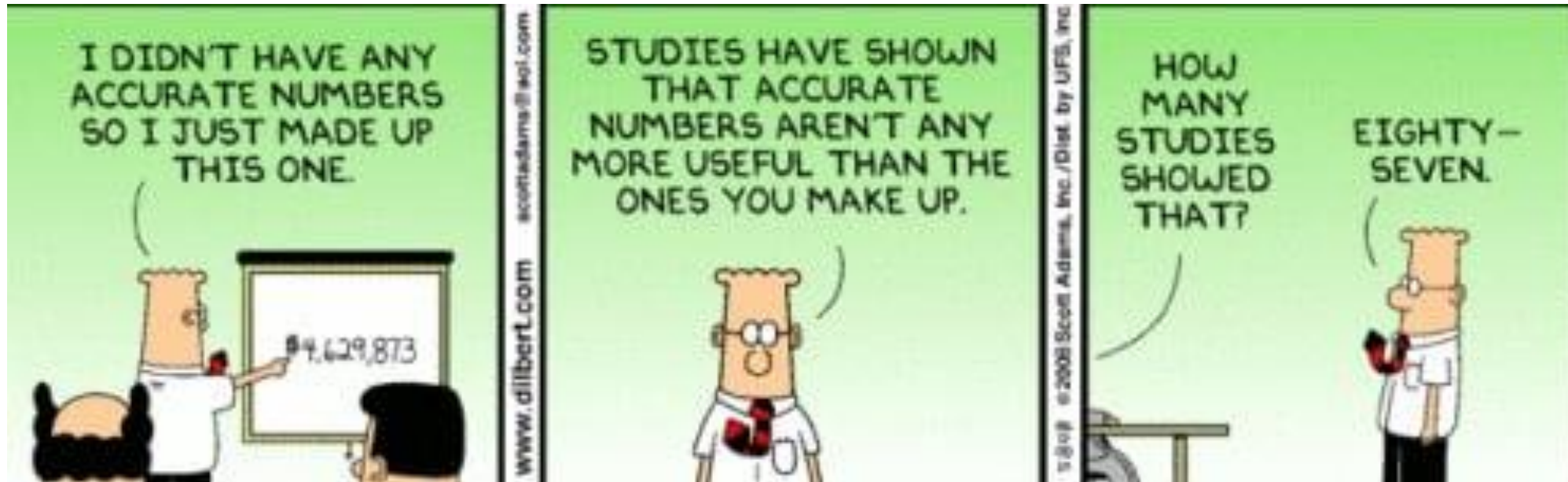
Now add 5 years for every woollen garment you are wearing,

Plus 3 years for every cotton garment

We don't have data on polyester clothing, so nothing to add

Shoes and belts are out of scope

Would this exercise result in a fair and accurate comparison?



Objectives of an EPD



EPDs are arguably the best chance for **independently producing LCAs to a **consistent and comparable** format**

Change in PCR requirements regarding capital goods



PCR 2019:14: Infrastructure related inventory flows that are not directly consumed in the production process [i.e. non-attributable!] can be excluded if it is not known to have the potential to cause significant impact.

(PCR = Product Category Rules)

Back to basics: How are capital goods included in an LCA?



If we are using background (ecoinvent) infrastructure data, then it is necessary that we understand these data.

Type of infrastructure processes:

- Buildings
- Energy infrastructure (plant, distribution network)
- Transport infrastructure (e.g. vehicles, roads)
- Equipment (machinery)

Capital goods in LCA



- We studied 38 building materials and products to better understand how capital goods are covered in ecoinvent
- What we found wasn't very pretty...
- In fairness, the data were never intended to be used for robust comparisons

Some ecoinvent processes specifically state **“This module should not be used if its relative importance would be high in a certain environmental inventory”**



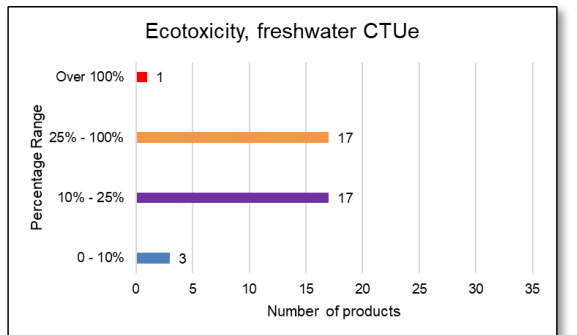
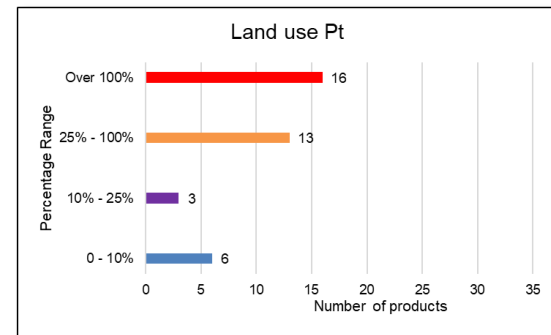
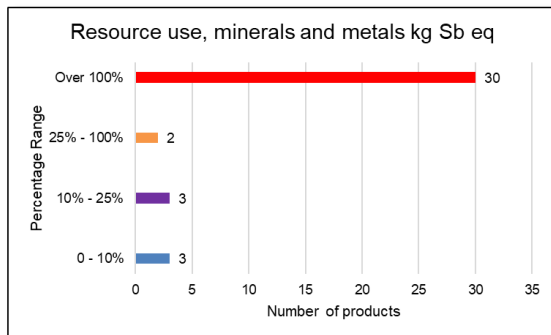
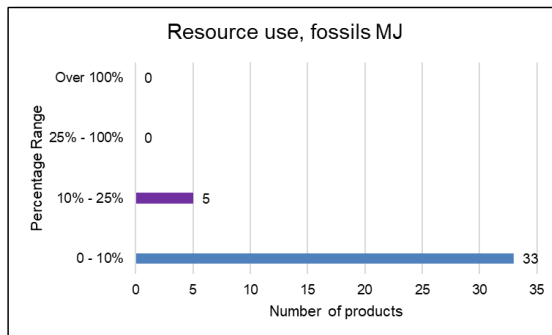
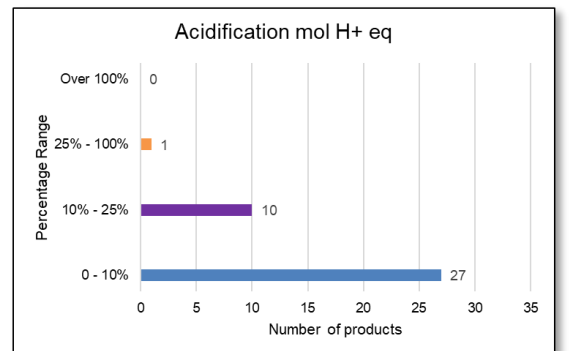
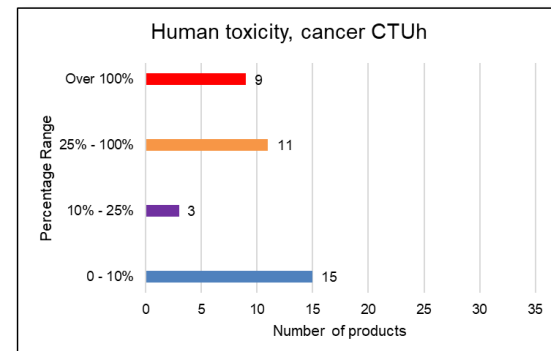
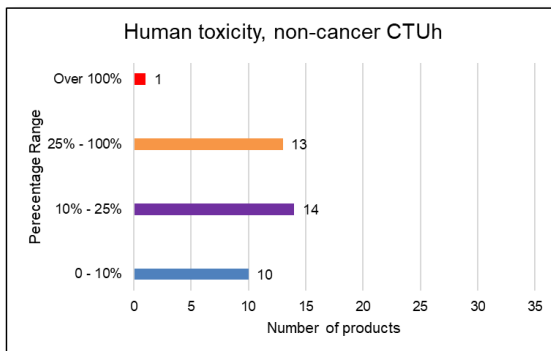
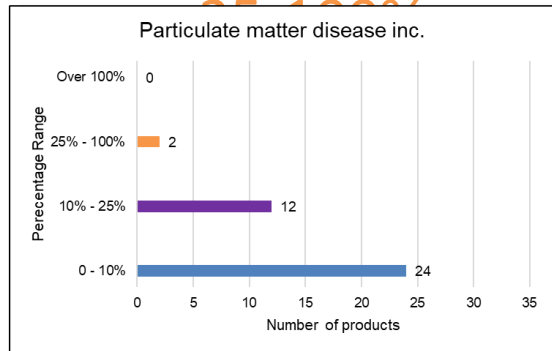
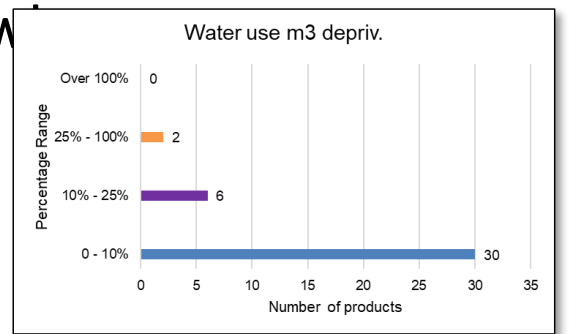
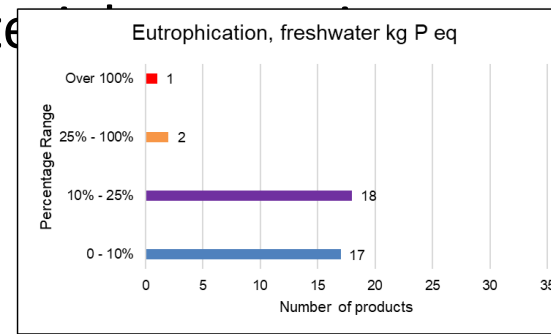
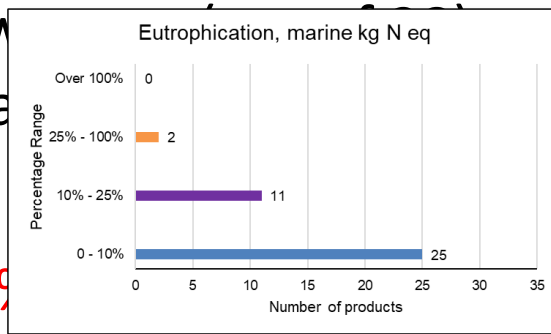
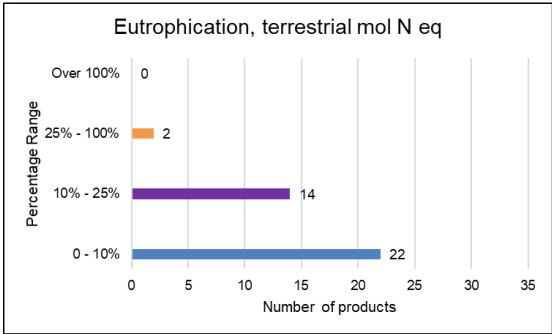
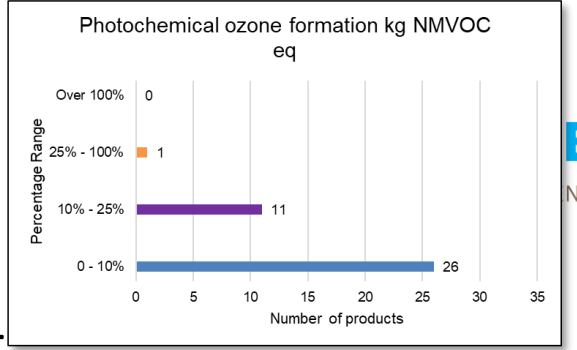
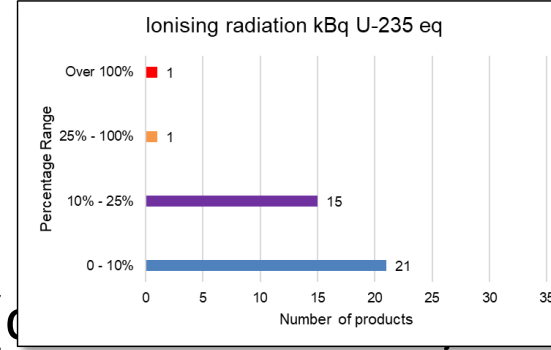
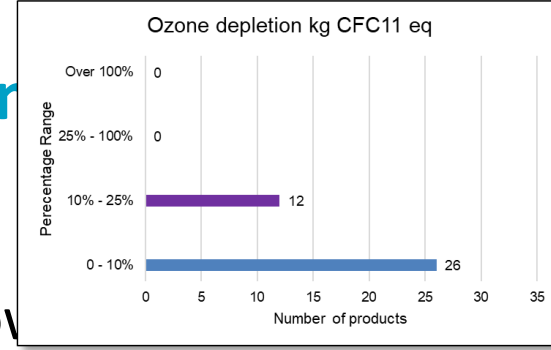
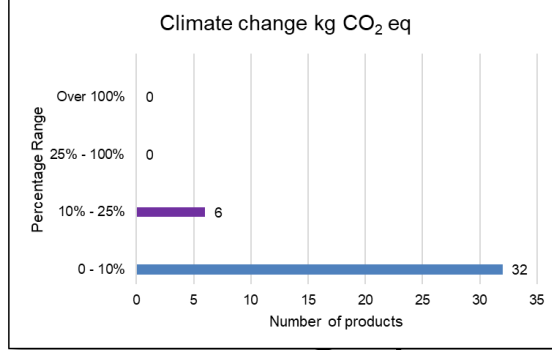
- What we found wasn't very pretty:
 - By definition, capital goods data are highly simplified data based on multiple levels of assumptions (quantification, production throughput, durability)
 - The data are not consistently developed across the various capital goods, creating a random influence at product level
 - Inconsistent implementation across products
 - A key building dataset contains a significant error that can dominate ADPE and has gone unnoticed for 15-20 years

Capital goods in LCA



- The scope (which types of capital goods are included) varies between software / databases
- Very few practitioners navigate this landscape; it is assumed the software / databases provide the solution
- There are no widely adopted guidelines for practitioners either

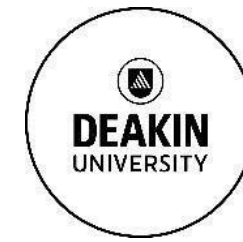




EPD results after including capital goods



Objectives of an EPD



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EPD[®] MAKING SENSE

Environmental product declarations present **relevant** and **verified** environmental information about goods and services from a life cycle perspective.

EPD[®] ALLOWS YOU TO:

- **Fairly compare environmental performance**
- **Reflect continuous environmental improvement**
- **Present relevant environmental information**

USE IT TO REACH DIFFERENT DECISION MAKERS

The information in an EPD[®] is objective. Therefore it's the same regardless of whom you want to reach with your EPD[®] verified product, whether it's product designers, environmental managers or consumers.

COMMUNICATING ENVIRONMENTAL PRODUCT DECLARATIONS (EPD[®])

- Convince your colleagues about identifying significant environmental aspects, monitoring and improving performance
- Reach out to your suppliers on how to improve their processes
- Give consumers the information they need relating to the environmental performance of your products



Including capital goods violates ALL of these highlighted principles!

What does inclusion of capital goods mean for robustness/reliability of EPDs?



In summary:

unjustified

- We are adding random non-attributable elements to our inventories

uncertain

- We are not collecting reliable data on any infrastructure processes within the core processes, let alone that we are able to confirm the validity of background processes (other than proving they are not valid)

inconsistent

- We do not have any guidance on if or how LCA practitioners are expected to adjust (background) infrastructure data

high impact

- Adding infrastructure using standard (ecoinvent) data will always have a material impact (>25%) on at least one of the mandatory indicators

inappropriate

- Standard (ecoinvent) data “should not be used if its relative importance would be high in a certain environmental inventory”

irrelevant

- There is no causal relationship (relevancy) between the inventory data and actual supply chain

Conclusion



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If we want that:

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...there can be no other conclusion than **capital goods need to be excluded until we **better understand the issue**, our **databases contain appropriate data** and we are confident that **inclusion is credible and adds value to EPDs.****



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