



**Environmental Engineering (EE);  
Explore the challenges of developing product group-specific  
Product Environmental Footprint Category Rules (PEFCRs)  
for smartphones**

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# Foreword

This Technical Report (TR) has been produced by ETSI Technical Committee Environmental Engineering (EE).

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# Modal verbs terminology

In the present document **"should"**, **"should not"**, **"may"**, **"need not"**, **"will"**, **"will not"**, **"can"** and **"cannot"** are to be interpreted as described in clause 3.2 of the [ETSI Drafting Rules](#) (Verbal forms for the expression of provisions).

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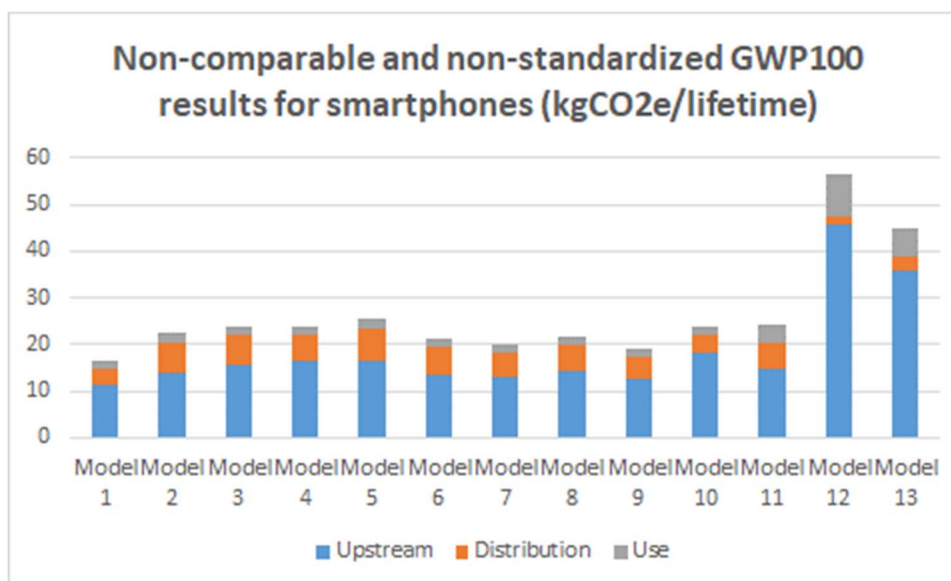
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# Introduction

In 2013, the European Commission (EC) released a proposal for the use of common methods to measure and communicate the life cycle environmental performance of products and organizations [i.1]. EC started a journey to test the Product and Organization Environmental Footprint methods in action. Together with more than 260 volunteering organizations EC tested how to develop product- and sector-specific rules, how to communicate and verify Environmental Footprint (EF) information. In January 2018 EC announced that the journey is coming to an end [i.2].

It can therefore be concluded that Life Cycle Assessment (LCA) seems to be slowly converging into a useful policy tool. To this end the electronics and ICT industry and others have in recent years started to prepare for possible LCA legislation from the European Commission according to the so called Product Environmental Footprint (PEF) method. The aim of PEF is to enhance the quality of LCAs by harmonization, leading to comparable product environmental footprints within specified product groups in a single market.

Figure 1 shows a set of non-comparable and non-standardized GWP100 results for smartphones for selected life cycle stages.



**Figure 1: Non-comparable and non-standardized GWP100 results for smartphones**

The PEF method might help verify the reliability of the results such as those shown in Figure 1.

Nevertheless, PEF has been questioned for not leading to comparative results but only reproducible results [i.3] and [i.25]. Using PEF, specific features of individual products can seemingly not be reflected (e.g. how to compare "standard" and "durable" devices when the same lifetime is assumed). Still, the PEF Category Rules (PEFCR) Guidance [i.7] states that comparability is possible if the results are based on the same PEFCR.

NOTE: This might be true for PEFCR but it is not true for the EPD System Product Category Rules (PCR) [i.19] which are too flexible regarding data quality and functional unit selection.

Examples of unique features of PEF - compared to e.g. the European Telecommunications Standards Institute (ETSI) standard for LCA [i.4] and [i.5] - are the strict requirements on data quality, definition of exact FU, default end-of-life (EoL) scenario, mid-point impact categories, and that cut-off should be avoided. Moreover - in order to be compliant with PEF - the industry leaders for each product group sold in the EU - such as smartphones - will have to reach consensus on the product category rules (PCR) for these product groups.

Recently IT storage equipment - belonging to classification 26.2 in Statistical Classification of Products by Activity in the European Economic Community [i.6] - was investigated in an official PEF pilot.

In 2017 a guidance document was published including the experience of the PEF pilots [i.7]. Oja et al. argued that it is important to find a balance between comparability, reliability, and costs when performing PEF LCAs [i.8].

The common wisdom is that simplified LCA approaches do not have enough precision compared to Full LCA (FLCA) when applied to the rather complex life cycle of smartphones. Still, there exist several simplified LCA methods for smartphones [i.10]. Andrae identified that there are at least 14 different - simplified and full - methods for LCA of consumer electronics such as smartphones [i.11]. One of the FLCA methods is the PEF method, expected to be the state-of-the-art for FLCA [i.7]. In the present document only FLCA of smartphones will be discussed. PEF has very strict data quality requirements as product comparisons need good quality data. Ojala et al. [i.8] argued that PEFCR developers should devote time to finding the most appropriate methodological choices. There exists no analyses of the degree to which current smartphone Full LCAs fulfil the requirements of the strict PEF Guidance [i.10]. To shed light on that issue is one of the main objectives of the present document.

Moreover, the present document will discuss the discrepancy between FUs currently formulated for smartphones compared with those required by PEF. While comparability is the ultimate aim of the PEF FLCA method, it will require very high data quality lowering the uncertainty. Even with "perfect" data quality, there will be variability of LCA scores for the same type of smartphones.

Andrae and Vaija [i.5] argued that PEF has several strengths and weaknesses. Strengths include guidance and requirements on FU definition. Moreover, PEF demands relatively precise analyses of the supply chains which could lead to eco-innovation. Furthermore, the fact that cut-off is not "allowed" gives an estimation of the truncation error. Another benefit is that the circular footprint formulae should improve the end-of-life modelling for all.

However, again, the PEF method has several weaknesses. First the ambitious data collection targets cannot - by most actors - be applied consistently along the supply chain. Furthermore, the usefulness beyond traditional ISO [i.12] and [i.13] and ETSI FLCA standards [i.14] is in doubt as these data and comparability issues are not solved.

PEF also might threaten the flexibility needed by LCA practitioners in their pursuit to influence the product design holistically. Such worries are echoed by recent research [i.25].

The present document is expected to provide valuable input for all users of LCA within the smartphone sphere and to some degree also for the consumer electronics sphere. Five smartphone manufacturers approaches for FLCA have been analysed based on openly available information.

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# 1 Scope

The present document investigates current approaches, concepts and metrics of LCA as proposed by PEF and their applicability for the smartphones. The present document:

- 1) searches to identify if Product Category Rules (PCR) and Life Cycle Assessment (LCA) models for the smartphone product category have been developed;
- 2) explores existing PCRs and LCAs for gaps compared to the PEFCR Guidance requirements;
- 3) explore the challenges associated with: setting the scope, defining the unit of analysis, reference flow, representative products, product classification, system boundaries, data quality requirements, data collection, benchmark and classes of environmental performance, interpretation, reporting, disclosure, communication, and verification;
- 4) explores the challenges with PEF Screening (impact assessment, interpretation and conclusion, report).

# 2 References

## 2.1 Normative references

Normative references are not applicable in the present document.

## 2.2 Informative references

References are either specific (identified by date of publication and/or edition number or version number) or non-specific. For specific references, only the cited version applies. For non-specific references, the latest version of the referenced document (including any amendments) applies.

NOTE: While any hyperlinks included in this clause were valid at the time of publication, ETSI cannot guarantee their long term validity.

The following referenced documents are not necessary for the application of the present document but they assist the user with regard to a particular subject area.

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NOTE: Available at <http://ec.europa.eu/environment/eussd/smgp/index.htm>.

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## 3 Definition of terms, symbols and abbreviations

### 3.1 Terms

For the purposes of the present document, the following terms apply:

**assessment method:** procedure for determining the value of a metric or indicator and validating it

NOTE: The method could include measurement and calculation.

**component:** part of a product that cannot be taken apart without destruction or impairment of its intended use

**indicator:** quantifiable representation of a parameter

NOTE: Example includes acidification potential.

**material:** substance or mixture of substances within a product or product part [i.28]

**metric:** measurable representation of a parameter or indicator

NOTE: Examples include mass of product, disassembly time, and re-used parts.

**parameter:** entity representing an aspect

NOTE: Examples include acidification which is an entity representing environmental aspects

**product:** good or service

**product part:** sub-unit of a product

**substance:** chemical element and its compounds in the natural state or obtained by any production process, including any additive necessary to preserve the stability of the product and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the declarable substance or changing its composition [i.28]

### 3.2 Symbols

Void.

### 3.3 Abbreviations

For the purposes of the present document, the following abbreviations apply:

ASIC	Application Specific Integrated Circuit
CFC11E	CFC11 Equivalents
CFE	Circular Footprint Formulae
CO2E	CO2 Equivalents
EF	Environmental Footprint
EPCR	Existing PCR
EPD	Environmental Product Declaration
FLCA	Full LCA
FU	Functional Unit
GPS	Global Positioning System