

Informal comments related to a possible revision of ISO 14040 – 14043

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1. Role of LCA as a part of a management system/relation to ISO 14001

Within an environmental management system according to ISO 14001, LCA should be considered as a tool to identify significant environmental aspects of products. No obligation should be imposed on an organisation to use this tool, but if an organisation decides to use it, it should be an easy-to-use and an effective tool. This possible use is not clearly stated in the existing standards. For instance, the identification of significant environmental aspects of the products of an organisation is not mentioned as possible application of LCA in Figure 1 of ISO 14040.

For the industrial user it is of utmost importance that the language of the standard is aligned with the language of the standards of the ISO 9000 family and the other standards of the ISO 14000 family.

2. Inconsistencies/errors of the documents

Some inconsistencies with other standards to be used by an organisation as a part of the integrated management system based on ISO 9001 and ISO 14001 exist, e. g.

- the term "process" as defined by ISO 9000 should be adopted, as it has already been done by ISO/TS 14048. This implies some modifications of the definitions of "unit process" and "product system";
- ISO 14031 requires that organisations have to define indicators to demonstrate environmental performance. Organisations may use these indicators to demonstrate continuous improvement. Unfortunately, in ISO 14042 such indicators are defined as "indicator results". This inconsistency is painful as it hampers the use of LCAs

3. Gaps in the documents

No real gaps of the documents can be detected, problems are rather caused by overlaps due to the fact that different WGs have worked out the different parts of the LCA. For example, ISO 14040, ISO 14041 and ISO 14042 contain overlapping requirements on reporting. If somebody wants to perform an LCA or an LCI, he wants to read at *one* place how to report.

4. New methodological developments to be taken into account

From the stand-point of an industrial user who primarily wants to perform LCAs or LCIs in order to identify significant environmental aspects and options for continuous improvement, methodological improvements which allow to perform such studies with less efforts but without compromising the basic requirements of the existing standards and the quality of the study would be of great importance.

Generally, a standard should be adapted to the state-of-the art by revision. Nevertheless, new methodological developments should only be incorporated if approved by all members of the WG.

Results of recent scientific discussion and scientific work may be helpful to simplify and clarify complicated and sometimes vague provisions on "hot issues" such as allocation, comparative assertions, weighting etc. without compromising the intentions of the standards.

5. How to improve readability?

Improvement of the readability is of utmost importance. Nevertheless different users of the standard may have different interests, e. g.

- practitioners who are required to peer an LCA study based on the ISO standards need no specific instruction how to perform an LCA, but they need a clear and consistent set of requirements which have to be respected;
- environmental experts in industry who need instructions how to perform an LCA of products for specific purposes with minimum costs but without compromising the requirements of the standards;
- persons with limited experience about LCA but the intention to use this tool for the future, e. g. students or potential users in developing countries;

Therefore, it should be tried to restructure the standards to improve readability.

The Danish proposal intends to work out one standard, e. g. a revised ISO 14040, which contains all requirements of ISO 14040 – 14043, and another standard, e. g. a new ISO 14 044, which contains the necessary guidance, in a simple language.

Generally, I appreciate this proposal, as it may meet the intentions of the different types of users. Nevertheless, I would like to have such a draft "twin standard" in hands before I would give an official positive vote for such a structure. Therefore, I would like to encourage the Danish delegation to make such a draft available as soon as possible.

Generally, the standards, especially ISO 14042, still contain too much scientific language which should be replaced by a clear normative language.

6. Inclusion of other aspects (economical/social)

The scope of the existing standards should not be changed. It has been clearly stated that LCA is not the only basis for decision making. Therefore other aspects need not be incorporated. If somebody wants a standard for "life cycle sustainability assessments" he should ask for a new work item.