



ECCS position regarding TC350 CIB if prEN17662 is compliant with EN15804/A2:

Background

TC135/WG17 has developed a complimentary PCR (c-PCR) to EN 15804/A2 with rules on how to apply EN15804/A2 when making an environmental product declaration (EPD) for constructional steel and aluminium. The standard (c-PCR) has the number prEN 17662.

When developing EN15804 TC350/WG3 could not agree on the allocation rules and the standard was left ambiguous regarding allocation of co-products. This has led to many steel companies interpreting the standard in one way and the concrete industry in another way regarding granulated blast furnace slag.

The new standard prEN 17662 is open to two different methods for co-product allocation:

- Physical allocation by process subdivision which is used by a number of steel companies
- Economic allocation that is preferred by companies related to the cement industry

It is in prEN17662 stated that allocated burdens must be declared as additional information.

CEN has given TC350 the task to secure that standards referring to EN15804/A2 are compliant with the rules which is done by a review system where the committee producing the c-PCR meet TC350/WG3 to discuss the c-PCR. Since no agreement could be reached TC350 has issued a CIB to determine the position of TC350 that will be used in later discussions between TC350 and TC135 at CCMC and CEN BT levels.

The CIB

It is the position of ECCS that:

- **Mirror Committees must vote: Yes, prEN 17662 is compliant with EN 15804/A2**
- **EN 15804/A2 provides a clear hierarchy on the rules that must be applied** for the “Allocation of input flows and output emissions”
 - **Allocation shall be avoided as far as possible** by dividing the unit process to be allocated into different sub-processes that can be allocated to the co-products and by collecting the input and output data related to these sub-processes.
 - **If a process can be sub-divided but respective data are not available, the inputs and outputs of the system under study should be partitioned between its different products or functions in a way which reflects the underlying physical relationships between them;** i.e. they shall reflect the way in which the inputs and outputs are changed by quantitative changes in the products or functions delivered by the system.

- **Allocation based on physical properties or economic values must be avoided as far as possible.**
- **prEN 176622 cPCR states “The blast furnace shall be sub-divided by partitioning between the pig iron and slag intended for granulation, in a way which reflects the underlying physical relationships between them.** In other words, they shall reflect the way in which the inputs and outputs are changed by quantitative changes in the products or functions delivered by the system.”
- The methodology provided in “ **A methodology to determine the LCI of steel industry co-products 14 th February 2014”** ([LCE2006 \(worldsteel.org\)](http://www.worldsteel.org/CE2006)) that has been **critically reviewed by PWC** in “Critical review of the steel co-product allocation method developed by EUROFER in cooperation with the World Steel Association” (document accessible in the following link [“Critical Review of a Life Cycle Assessment of dash panels made of quietsteel versus aluminium \(worldsteel.org\)”](http://www.worldsteel.org/CE2006/Critical_Review_of_a_Life_Cycle_Assessment_of_dash_panels_made_of_quietsteel_versus_aluminium.pdf)), is a well-recognized science based, peer-reviewed method, based on physical relationships, for allocating resource use and environmental burdens between blast furnace hot metal and slag.
- **This methodology is clearly compliant the following EN 15804/A2 the request:**

“If a process can be sub-divided but respective data are not available, the inputs and outputs of the system under study should be partitioned between its different products or functions in a way which reflects the underlying physical relationships between them; i.e. they shall reflect the way in which the inputs and outputs are changed by quantitative changes in the products or functions delivered by the system”
- According to EN 15804/A2, partition of the inputs and outputs between different products in a way which reflects the underlying physical relationships between them must be considered before allocation according to economic or physical properties.
- **TC350 has no valid reason to claim that prEN17662 is not compliant with EN15804** and TC 350 has not justified why the proposed methodology fails to partition inputs and outputs of the system in a way that reflects the underlying physical relationships between them.