

# Guidance on the implementation of Commission Recommendation (EU) 2021/2279 in the context of lower availability of EF compliant datasets

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# 1. Guidance on the implementation of Commission Recommendation (EU) 2021/2279 in the context of lower availability of EF-compliant datasets

The Product Environmental Footprint (PEF) and the Organization Environmental Footprint (OEF) methods, published in the Annexes of the Commission Recommendation (EU) 2021/2279, have been developed to measure and communicate the life cycle environmental performance of products (goods and services) and organisations.

A prerequisite for implementing the EF methods is the availability of high-quality and regularly updated data, namely EF datasets. The use of common EF datasets is necessary to ensure comparability between different assessments, consistency and harmonization among EU policies and initiatives, and cost reduction for companies.

Most EF 3.1 datasets were provided by various service providers through procurement contracts and were valid until end of 2025. In order to comply with public procurement rules, the validity of these datasets could not be extended for a longer period. The Commission is still working on the development of the new EF4.0 database. Therefore, at present, it cannot be guaranteed that users can perform EF compliant studies or implement Product Environmental Footprint Category Rules and Organisation Environmental Footprint Sector Rule (PEFCR/OEFSRs).

The Commission acknowledges that, in the current suboptimal data context, the restriction on using non-EF compliant datasets may hinder the implementation of the Commission Recommendation (EU) 2021/2279. Therefore, as a temporary solution, when EF-compliant datasets are not available, the Commission advises stakeholders to use other secondary datasets following the approach reported below. This new approach shall be applied whenever a reference to EF-compliant datasets is made in the Commission Recommendation (EU) 2021/2279, or in PEFCR/OEFSRs updated or finalised in accordance with this recommendation (See links below). **EF studies will be exceptionally considered EF-compliant even if non-EF compliant datasets contribute more than 10% to the single overall score.**

EF studies performed by using non-EF compliant datasets selected by the user (e.g. in EF studies performed without an available PEFCR/OEFSR, or EF studies performed in accordance with a PEFCR/OEFSR for which the Technical Secretariat does not indicate the default non-EF compliant datasets to use) shall include the following disclaimer: *'This EF study was performed by using non-EF*

*compliant datasets selected by the author, which may hinder comparability of results’.*

The Commission recommends this approach until the next version of EF datasets (EF 4.0) is available. The validity of the abovementioned PEFCR/OEFSRs is, therefore, extended until the next EF database is in place (expected in 2028).

**Comparability of EF results may be hindered when non-EF compliant datasets are selected by the EF user. The European Commission cannot be held responsible for any use of such results by EF users or third parties, including their use in public communications or to claim compliance with any voluntary rules, schemes, or initiatives at EU, national, regional, or local level.**

## 2. Hierarchy for the selection of the datasets

### 2.1. For EF studies carried out without a PEF/CFR/OEF/FSR formally developed in cooperation with the Commission

Whenever a reference to EF compliant datasets is made in annex I and annex III of the Commission Recommendation (EU) 2021/2279, this reference shall be considered as replaced by the following hierarchy and conditions:

1. EF studies shall use secondary datasets that are EF compliant, when available.
2. In the absence of EF compliant secondary datasets, the selection of the datasets to be used shall be done according to the following rules:
  - a. Use entry level (EL) ILCD compliant datasets from one single, unit process-based database if possible. Otherwise, multiple process-based database can be used. The use of these EL-ILCD datasets should be reported in the limitations section of the EF report.
  - b. If no EF compliant or EL-ILCD compliant dataset is available, then the process should be excluded from the model. This shall be clearly stated in the limitations section of the EF report <sup>(1)</sup>.

The EF report shall include the following statement: This EF study was performed by using non-EF compliant datasets selected by the author, which may hinder comparability of results

Non-EF compliant datasets (i.e. those referred to under points 2 and 3 above) can lack compatible DQR scores. The DQR of an EF study produced by using non-EF compliant datasets shall not be calculated. However, should the EF user be willing to calculate the DQR of the EF study, they may recalculate the  $T_{eR}$ ,  $T_{iR}$ ,  $G_{eR}$  and  $P$  of the non-EF compliant datasets.

The EF report of an EF study performed by using non-EF compliant datasets shall, at minimum, consist of a summary, the main report and the annex. In this case, there is no need for developing, making available and submitting to the European Commission an aggregated EF compliant dataset.

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<sup>(1)</sup> Many existing databases fulfil the requirements to be qualified as entry level ILCD compliant database. For further information, please check the mapping of existing databases available at: [Environmental Footprint Methods - Green Forum - European Commission](#)

## 2.2. For EF studies carried out in accordance with a PEFCR/OEFSR formally developed in cooperation with the Commission

During the last years (transition phase 2018-2025) several PEFCRs and OEFSRs have been developed or updated (those from the pilot phase). The list is available at [PEF METHOD - Green Forum - European Commission](#) and [OEF method - Green Forum - European Commission](#).

These PEFCRs/OEFSRs were developed in accordance with Annex II and IV of the Commission Recommendation (EU) 2021/2279. They are built on the EF3.1 datasets and therefore their validity is interlinked with the validity of the EF3.1 datasets.

The PEFCRs and OEFSRs specifies which data shall be included in the EF study as primary data and which ones they can be included as EF compliant secondary data. Because some of the EF3.1 datasets will not be available as of end of 2025, it may happen that default secondary datasets included in the PEFCRs or OEFSRs draft are no longer available.

For the reason, the Commission advice the EF users of an EF study in accordance with a PEFCR/OEFSR to apply the following hierarchy for the selection of datasets. This approach will extend the validity of the PEFCR/OEFSR until a new EF database is in place (expected in 2028).

1. Use EF compliant datasets
2. In case the EF compliant secondary datasets included/cited in the PEFCR/OEFSR are not available, it should be replaced according to the following options (in hierarchical order):
  - a. Use EL-ILCD compliant datasets selected by the Technical Secretariats to replace the non-available EF compliant datasets. The EL-ILCD datasets selected by the Technical Secretariats should be part of a single, process-based database if possible. Otherwise, multiple process-based database can be used. The selected datasets by the Technical Secretariats should be published in annex or corrigendum to the finished PEFCR/OEFSR
  - b. If no EL-ILCD datasets are selected by the Technical Secretariat, the EF user should select EL-ILCD datasets from one single, process-based database if possible. Otherwise, multiple process-based database can be used. This should be clearly stated in the

EF report and validated by the EF study and EF report verifiers. The EF report shall include the following statement: *This EF study was performed by using non-EF compliant datasets, which may hinder comparability of results*

The PEFCRs/OEFSRs recently finalized or updated should not recalculate their representative products. The PEFCR draft should not be modified apart from adding an annex or corrigendum with the selected datasets by the Technical Secretariat. Scrutiny by the Technical Advisory Board and the EF steering expert groups is not required.

Non-EF compliant datasets usually lack DQR score, thus the DQR of an EF study produced by using non-EF compliant datasets is not needed to be calculated. However, should the EF user willing to calculate the DQR of the EF study, they shall recalculate the  $T_{eR}$ ,  $T_{iR}$ ,  $G_{eR}$  and  $P$  of the non-EF compliant datasets.

The EF report of an EF study performed by using non-EF compliant datasets shall, at minimum consist of a summary, the main report and the annex. In this case, there is no need for developing, making available and submitting to the European Commission an aggregated EF compliant dataset.

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### EU law and related documents

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### EU open data

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