

Options for Resource Efficiency Indicators

Personal Information of the Respondent

Title -single choice reply-(optional)	
Name -open reply-(optional)	ANEC-EU consumer voice in Standards
E-mail -open reply-(optional)	anec@anec.eu
Who do you represent? -single choice reply-(compulsory)	NGO (EU level)
Country where you OR your organisation/company is based: -single choice reply-(optional)	BE - Belgium

Questions on Resource Efficiency Indicators

1. What are the key issues that need to be addressed by indicators to support resource policy? -open reply-(optional)

1) Indicators are needed for the overall resource use of EU and in Member States in particular for: - energy - water - relevant materials - waste - artificial and built-up land use and use change. In addition, appropriate sub indicators should be developed. 2) Indicators are also needed to measure the overall consumption level of citizens. To this end it will be crucial to measure direct and indirect consumption, (including the consumption embedded in products) by citizens for energy, water and relevant materials for key products (e.g. meat). Indicators for land (use change) per capita and waste production per capita should be developed. In addition, appropriate sub indicators should be developed. 3) Resource efficiency indicators should be developed for key processes such as for example energy consumption of buildings per square meter per year, the share of public transport (including goods and people), the average fleet consumption per 100 km and the resource intensity per tonne of key raw material such as steel.

2-a. Is the proposed lead indicator, GDP/DMC an appropriate indicator to measure resource efficiency? Are there any better alternatives that should be considered?

-open reply-(optional)

We do not support using GDP/DMC as lead indicator because the indicator suffers from severe shortcomings: - EU economies have quite different structures, the higher the proportion of services, the better an economy will perform on the scale due to the GDP/DMC indicator in terms of resource efficiency. Looking at real data reinforces the scepticism: Malta achieves a scope of 5,05, Luxemburg of 3,28, the Netherlands 3,28, the UK 2,53, Germany 1,8 and Finland 0,78 PPS/kg according to Eurostat data given in the consultation document. What can we conclude from this? That Malta's material efficiency is the best in Europe? The indicator may be good for measuring deindustrialisation but this should not be the objective! - The indicator combines different materials of quite different concern and scarcity - "mixing apples and pears" - It ignores materials embedded in (semi-finished) products - the more (resource intensive) production is outsourced to foreign countries the higher the efficiency seems to be - It is questionable to relate efficiency to monetary values rather than to physical output units - It would be difficult to set useful benchmarks or targets using this indicator Hence, the indicator is of little use and not suitable as lead indicator. Efficiency can only be measured at the process level in a meaningful manner. More suitable would be a mixed indicator for resource intensive key processes. The focus should be on scarce or high impact materials.

2-b. Are the appropriate indicators included in the dashboard of macro-indicators? Are there any alternatives that should be considered? -open reply-(optional)

The most important resource indicator from our perspective is energy consumption rather than CO2 emissions. Gross inland energy consumption and direct and indirect (embedded in products) energy consumption by citizens per capita are of highest importance. A mix indicator for the efficiency of key processes could be developed. The analogous indicators for water consumption and artificial and built-up land use (change) need to be established. Again, we point to the high importance to take into account indirect water and land uses (embedded in products). GHG (or any other) emissions and carbon footprint of products are not suitable resource indicators because: - resource indicators should focus on resource use rather than on impacts. If the aim is to measure impacts, we need to focus on all impacts of all resource uses, not just one. - A reduction of energy consumption will always result in GHG savings but the opposite is not true. A GHG indicator may support installation of additional capacities of green electricity generation. However, an increasing energy production with renewables may be more cost intensive for consumers than implementing energy efficiency measures and may

lead to energy wasting. A GHG indicator may also support the use of unsustainable low carbon sources such as nuclear energy. Indicators for (municipal) waste generation should be foreseen in the dashboard. These indicators should also include waste embedded in products if possible.

2-c. Are the appropriate indicators included in the third tier of thematic indicators? Are there any other indicators that should be considered? -open reply-(optional)

Question 2c seems to overlap with question 2-d. We provide some specific answers below. As regards table 3 of the consultation paper we reiterate the comment above (2-b) on GHG or any other emissions: resource indicators should focus on resource use rather than on impacts (biodiversity, clean air, etc.). If we look at impacts, we have to look at all impacts of all resource uses. We would certainly appreciate a broadening of the indicator debate addressing all kinds of environmental /sustainability issues with indicators. However, it needs to be two sets of indicators to be developed subsequently, not an arbitrary mix. We support the idea to establish indicators for key sectors. Food, buildings and mobility are certainly good sectors to start with, but other industrial sectors should also be covered; for example an indicator on 'share of public transport' should be considered both for goods and people.

2-d. Are the appropriate indicators included in the Scoreboard? Are there any other indicators that should be considered? -open reply-(optional)

We doubt the usefulness of indicators such as the Eco-innovation index which are highly complex, intransparent, based on questionable components (such as material productivity as defined above or ISO 14001 certification) and weighting and which have not necessarily to do with resource consumption. It is hardly suitable for target setting. The same applies for life cycle resource indicators (Environmentally weighted material consumption) suggested by BIO IS which we do not support. Likewise, the level of environmental taxes as such is not an indicator for good environmental performance. If the tax is effective, the tax yield will diminish over time. Thus, a low level of environmental tax revenue could mean that either the policy instrument has been well implemented or that no ecological taxes have been introduced in a country. Further, environmental taxes are not necessarily resource related and therefore hardly usable for benchmarking and target setting. Concentrations of particulate matters, EU population in areas with PM concentrations exceeding daily limit values, Gross nutrient balance (nitrogen and phosphorus) are undoubtedly important - but we wonder whether they should be covered under the heading "resource efficiency". We support the proposed waste indicators (food waste should be clearly added). Fish catches from stocks outside the safe biological limits, and consumption of meat and dairy products per capita per year are important. Energy consumption per square meter for space heating should be measured as total (primary and final) energy consumption per square meter.

3. Which indicators would be best suited for potentially setting targets, by 2013 and for the future? -open reply-(optional)

It would be good if compulsory targets of a reduction of the overall energy consumption by 20% by 2020 were introduced to achieve significant energy savings while making sure that investments are done in the most cost-effective way and thoroughly analysing the impact on prices for consumers, ensuring that all energy consumers and in particular vulnerable consumers are protected. We support making a reduction of the overall energy consumption by 20% by 2020 compulsory. It should be accompanied by specific and interim energy saving targets (e.g. for buildings, transport, industrial facilities, etc.). Also a target for 2050 should be established (e.g. 40-50%). Targets for material consumption should be set for specific materials (e.g. rare earths) and processes based on feasibility studies. Targets for water use and artificial and built-up land use (change) should be established. As quickly as possible indicators for direct AND indirect (embedded in products) consumption by citizens of energy, water, relevant materials and land (use change) per capita should be agreed upon as a prerequisite to fix targets. Waste generation reduction targets including for food waste should be set. Fuel efficiency targets (or CO2 emission targets) for all kinds of vehicles should be set using test procedures which are more in line with real life than the current ones. Targets for the energy consumption of the building stock or renovation targets should be established not only for public buildings. Targets for (the reduction of) meat consumption should be established.

4. Any other comments / suggestions. -open reply-(optional)