

Comments on draft PCR



Template version: 2019-07-30

www.environdec.com/PCR

About PCR

Name:	c-PCR Air ducts, substantial materials
Version/date:	2021-XX-YY

About stakeholder providing comments

Name:	Erik Österlund
Organisation:	Svensk Ventilation
Date:	2021-03-23
I agree that my comments may be published (yes/no):	yes
I would like to be listed as a contributor in the PCR and at www.environdec.com (yes/no):	yes

Comments

We strongly oppose to this c-PCR, mainly because of its narrow scope.

This c-PCR must be harmonised with the c-PCR on ventilation products being developed by EPD Norge. The latter has been developed jointly by several manufacturers of ventilation products and stakeholders. Therefore our proposal is that *c-PCR Air ducts, substantial materials* is adjusted to follow the c-PCR from EPD Norge. The harmonisation should wait until the c-PCR from EPD Norge has been approved and published, so changes are made according to the final version. After adjustments of *c-PCR Air ducts, substantial materials* it should be sent for a second enquiry. Going forward, updates of this c-PCR must be harmonised and commonly agreed by manufacturers, stakeholders, EPD Norge and EPD International.