

Assessment of strategic options: PEF/PEFCR vs. EPD

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Fact-based sustainability

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Prepared by: Luca Zampori

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PRé Sustainability B.V.

Stationsplein 121

3818 LE Amersfoort

The Netherlands

T +31 33 455 50 22

E consultancy@pre-sustainability.com

W pre-sustainability.com

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Assessment of strategic options: PEF/PEFCR vs. EPD

This note outlines the key advantages and disadvantages of two potential pathways for environmental footprinting for ESTC: continuing work under the Product Environmental Footprint Category Rules (PEFCR) framework, or transitioning towards Environmental Product Declarations (EPDs).

Option 1: continuing under PEF / PEFCR

Pros

- **State-of-the-art methodology**
The PEF framework, as developed by the European Commission, represents one of the most advanced and comprehensive approaches to life cycle assessment currently available.
- **High level of prescriptiveness and comparability**
PEFCRs provide detailed and harmonized rules, ensuring a high degree of consistency and comparability across products within the same category.
- **Significant work already completed**
The development of the PEFCR has required substantial investment of time and resources.

Cons

- **Limited control over process and timelines**
The process is largely driven by the European Commission, resulting in reduced control for ESTC and its members and uncertainty regarding next steps and timing.
- **Obsolescence of EF 3.1 datasets**
The Environmental Footprint (EF) 3.1 datasets have expired, and the Commission has not been able to extend agreements with data providers, including those relevant for ESTC. As a result, the use of EF 3.1 datasets is no longer a viable option.
- **Uncertainty around EF 4.0 dataset availability**
A contract for developing EF 4.0 datasets was launched by DG RTD in 2022 but discontinued at the end of 2025. A new tender is expected to be issued by DG ENV before summer 2026 (please treat this as confidential information). However:
 - Contract signature is unlikely before autumn 2026,
 - Based on past experience, dataset delivery is not expected before late 2027 in a very best case scenario, and more likely in 2028,
 - The prioritization of datasets remains unknown until the tender is published, therefore we cannot know if the datasets needed by ESTC will all be developed.
- **Ongoing revision of the PEF method**
The PEF method itself is currently under revision, with a consultation expected in May 2026 and formal adoption foreseen by the end of 2026.

- **Risk of methodological misalignment between PEFCR developed following EF 3.1 and old recommendation and EF 4.0 and new recommendation**
EF 4.0 datasets will be aligned with the updated PEF methodology. This creates a likely inconsistency with existing PEFCRs developed under the 2021 Recommendation and EF 3.1 datasets. Consequently:
 - The PEFCR would likely require revision
 - Such revision would depend on the availability of EF 4.0 datasets
 - Work on updating the PEFCR could not realistically start before 2028, with completion potentially in 2028–2029.
- **Exposure to political uncertainty**
As an EU policy initiative, PEF is subject to political developments, which may affect priorities, timelines, and continuity.

In summary, there is a complex and uncertain overall timeline, because several interdependent developments create significant uncertainty:

- New PEF method adoption (expected end 2026)
- EF 4.0 dataset development (expected 2027–2028)
- Potential PEFCR revision (likely 2028–2029)

Option 2: transitioning to EPDs

Pros

- **Full control over process and governance**
The EPD framework operates under established and stable rules, allowing ESTC to retain control over timing and decision-making, without dependence on EU policy processes.
- **Strong market recognition**
EPDs are widely used and accepted across multiple sectors and markets.
- **High credibility through third-party verification**
EPDs are independently verified, ensuring robustness, transparency, and trust among stakeholders.
- **Positioning in the context of Construction Products Regulation (CPR) if classified as construction products**
Should synthetic turf be formally recognized as a construction product, EPDs would align particularly well with CPR, which is based on harmonized standards to be developed in alignment with EN15804.
- **Faster development timelines**
Product Category Rules (PCRs) can typically be developed within 6–12 months, significantly faster than PEFCR processes.
- **Ability to leverage existing work**
A substantial portion of the existing PEFCR content can be reused, to develop the content of the PCR.

- **Earlier operational readiness**

Companies could begin developing and publishing EPDs as early as 2027, roughly 2 years before a PEFCR aligned with EF 4.0.

Cons

- **Need for adaptation by companies with existing EPDs**

Companies that have already developed EPDs may need to update or redevelop them to align with newly developed PCRs, or may play in a different “playground” because their EPDs would be based on the more general EN 15804 standard.

- **Transition effort for companies familiar with PEFCR**

Organizations that have invested in PEFCR-based approaches would need to adapt to a different framework, including new rules and processes.