

Employers' Organization of Polish Copper stance on the Organisation Environmental Footprint Sector Rules: Copper Production

On June 24th, 2016 the *Organisation Environmental Footprint Sector Rules in the Pilot Phase Sector: Copper Production* (hereafter called the OEFSR) was submitted, together with summaries of the supporting studies, to stakeholder consultation. Employers' Organization of Polish Copper would like to voice its concerns regarding some solutions presented in the document.

In the chapter 6.5. the OEFSR distinctly states that the main limitations of the methodology are:

- data availability of background processes, which incorporate ore mining and beneficiation;
- consequences resulting from the use of secondary data to model copper concentrate production;
- and the methodological robustness of, as identified in the supporting studies, by far the most relevant impact category, i.e. resource depletion – fossil and mineral. The impact in this category comes exclusively from the relatively poorly modelled process of copper concentrate production.

In the chapter 5. the OEFSR lists a number of requirements under which comparison of organisations environmental footprint is supported. Employers' Organization of Polish Copper objects to the comparison of multiple organisations environmental footprint unless the single most dominating hotspot of the analysis, i.e. copper concentrate production, is modelled using data specific for the particular organisation. Even though some interim solution has been proposed for the copper concentrate production modelling has been proposed in chapters 7.4. and 7.5.

Employers' Organization of Polish Copper does not consider them satisfactory. We suggest that solely organisations using primary data for concentrate production could be subject to comparison, regardless if they operate mines or not. All companies shall source appropriate data from concentrate suppliers so the results could be compared with other organisations. The environmental footprint communication might become an element of competitive advantage, therefore results shall not be based on industry average data in terms of process as significant as copper concentrate production.

An interesting, innovative approach towards fossil and mineral resource depletion has been elaborated in the annex XIV. However, before it could be used to model the most relevant impact category in an analysis destined for comparisons it shall undergo a review and gain broad acceptance both from the LCA and a mining community.