



e-post: anna-karin.jansson@sis.se

**SIS**  
**Remissvar**  
**Anna-Karin Jansson**  
**118 80 STOCKHOLM**

SIS/TK 307, Livscykelanalys, Miljömärkning och Miljödeklarationer

Svar på SIS-remiss 7651

avseende EN ISO 14021:1999/DAmD 1

**Senaste  
svarsdatum**                      **2010-03-12**

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**Uppgifter om svarslämnaren**x  Företag/Organisation/Myndighet                       Enskild personFöretag/Organisation/Myndighet                      Svensk EnergiHandläggare (namn, telefon)                      Cecilia Kellberg, 08-6772684Datum                      2010-03-12

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**Remissvar**

- Avstår
- Tillstyrker utan kommentarer
- x  Tillstyrker med kommentarer
- 
- Avstyrker med motivering
- x  Har erfarenhet inom det område förslaget täcker
- 
- Har tillämpat förslaget
- Ej berörd
- Kommentarer till föreslagen svensk titel
-

Datum

2010-03-12

Svarslämnare: Svensk Energi

Kommentarer på: SIS-remiss 7651

Förslag: EN ISO 14021:1999/DAmD 1

1	2	(3)	4	5	(6)	(7)
ID	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment	Comment (justification for changes)	Proposed change	Fylls i av SIS
	3.1.9		ed	IPCC specifies 6 GHGs and there exist more GHGs that are not considered by the IPCC such as H <sub>2</sub> O and ozone (O <sub>3</sub> ).	NOTE: GHGs to be considered are specified by the IPCC and include carbon dioxide (CO <sub>2</sub> ), methane (CH <sub>4</sub> ), nitrous oxide (N <sub>2</sub> O), sulphurhexafluoride (SF <sub>6</sub> ), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs).	
	7.15.1		ed	Wind power is often used instead of wind electricity and the source of wind electricity is the kinetic energy in the wind	Renewable energy sources include but are not limited to sunlight, wind energy, and biomass and geothermal sources when conforming to Clause 7.14.	
	7.15.1		te	The wording "Claims of renewability for energy sources associated with movements of water shall only be made if they are from sources that are managed in accordance with the principles of sustainable development." is remarkable. In Sweden hydro power is always defined as renewable. If requirements on sustainability should be added in the definition of renewable this should be applied on all kinds of energy sources.	Drop this sentence.	
	7.17.2.1		te	Other GHG-gases than CO <sub>2</sub> could be removed by destruction.	A product carbon footprint" is:the net amount of life cycle GHG emissions (clause 3.1.9). It also includes long term net removals of CO <sub>2</sub> -ekv.	