

ECO Platform AISBL, Avenue Kersbeek, 308 1180 Bruxelles

January 27, 2023

To whom it might concern

Subject ECO Platform current position on Mass Balance Approach (MBA) in EPDs

ECO Platform has since MBA – Mass Balance Approach, including the BMB - Biomass Balance Method became a topic some time ago, being pro-actively involved in order to find a common and harmonized way to handle said approaches in a structured manner within the statutes and strategy of ECO Platform. This in cooperation with EC – European Commission initiatives, standardisation working groups as CEN/TC350/WG 3 and the relevant industry. This also includes involvement from all EPD Program Operators in Europe, ECO Platform TEWOG – Technical Working Group and ECO Platform STAWOG – Standardization Working Group. Unfortunately, it will still take some time before we see the result and conclusion of this work.

However, since it is very important for with clarification, even without guidelines from the EU Commission and/or relevant ISO/EN standards covering the MBA principle, ECO Platform has in respect for EPD Program Operators, EPD Developers, EPD Users and finally for the EPD Owners, used all competence and information to come up with a current position and recommendation on MBA.

The ECO Platform Board of Directors decided as follows in the BoM on January 19th, 2023:

ECO Platform currently does not allow MBA in ECO EPDs

ECO Platform will continue to be actively involved in the ongoing processes for decisionmaking in critical issues like MBA:

Open a Task Group with a clear mandate for MBA within TEWOG Contribute to decisions finding on EC level (e.g. WG CPR Acquis) Contribute to standardization activities (e.g. CEN TC 350)

ECO Platform decision and position is as stated as our current position. ECO Platform is not saying yes or no to BMB but saying yes to further contribute to EC and CEN/TC350 initiatives. If or when, common BMB guidelines in accordance with EC and/or CEN/TC350 get approved, ECO Platform will implement BMB in EPDs accordingly.

With kind regards,

Hakon Hauan President ECO Platform

Address ECO Platform AISBL Avenue Kersbeek, 308 1180 Bruxelles, Belgium ContactPhone+49 320 317-2Emailinfo@eco-platform.orgInternetwww.eco-platform.org

Christian Donath Managing Director ECO Platform

Bank AccountBankING Bank BelgiumIBANBE65 3631 2216 7496BICBBRUBEBB

Tax No. BE 0538.575.177