

To whom it might concern

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

— Since Mass Balance Approach (MBA), including Biomass Balancing (BMB), became a very hot topic, ECO Platform has been pro-actively involved in finding a common and harmonized way to handle those new approaches in a structured manner within the statutes and strategy of ECO Platform. This, in cooperation with European Commission initiatives, standardisation working groups as CEN/TC350/WG 3 and the relevant industry. ECO Platform secures involvement from all ECO EPD Programme Operators, ECO Platform's Working Groups, namely TEWOG – Technical Working Group and STAWOG – Standardization Working Group. Unfortunately, it will still take some time before we see a final result and conclusion of this work.

— Without guidelines from the EU Commission and/or relevant ISO/EN standards on MBA, ECO Platform has used all its competence and information to come up with a current position and recommendation on MBA, since clarification it is very important for all stakeholders, especially EPD Programme Operators, EPD Developers, EPD Users and finally for the EPD Owners.

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

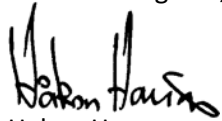
ECO Platform currently does not allow MBA in ECO EPDs

ECO Platform will continue to be actively involved in the ongoing processes for decision-making in critical issues like MBA and as such:

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

ECO Platform's decision is the current position. ECO Platform is not saying "yes" or "no" to MBA but saying "yes" to further contribution to EC and CEN/TC350 initiatives before any implementation. If or when, common MBA guidelines in accordance with EC and/or CEN/TC350 get approved, ECO Platform will implement MBA in EPDs accordingly.

With kind regards,

A handwritten signature in black ink, appearing to read "Hakon Hauan".

Hakon Hauan
President ECO Platform

A handwritten signature in black ink, appearing to read "Christian Donath".

Christian Donath
Managing Director ECO Platform

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