



**Mr. Janez Potočnik**  
Commissioner for Environment  
European Commission  
Rue de la Loi 200  
B – 1049 Brussels

4 March 2013

Dear Commissioner,

I am writing to you regarding DG Environment's work on a common methodological approach to assess, display and benchmark the environmental performance of products, services and companies ('environmental footprint').

Indicators and the provision of information are important to consumers, business and policy-makers in measuring and monitoring the sustainability of the EU's production and consumption patterns. European businesses across different sectors are already working individually or collaboratively to better understand the environmental impact of their companies, products and processes. They do so because understanding these impacts helps to develop ways to unlock resource efficiency opportunities, deliver better environmental stewardship, build up resilience and become more competitive.

In this regard, Life Cycle Assessment (LCA) is a useful and valuable instrument for industry in its work of continuously improving the environmental performance of a given product or process, as well as for the identification of life cycle stages with the highest impacts in the overall life cycle stages.

However, LCA is not meant to be used for comparisons within complex products. Ultimately, it might lead to market distortion and unfair competition due to misleading consumer information. In addition, several important aspects of the methodology are still subject to debate, as well as questions on availability of data, data quality and cost implications.

BUSINESSEUROPE is therefore concerned about the approach of using LCA as the default method to measure the 'environmental footprint' of products and organisations. The complexity, the related costs of excessive data collection and the need for clear and reliable information to the consumer all call for a cautious approach to avoid confusion and backlashes.

We call on you to define strictly the objective and scope of 'environmental footprint' methodologies in the forthcoming communication on the Single Market for Green Products and in the recommendation to Member States and business to be published in 2013.

It should be clearly specified that:

- further work is needed to set-up the 'environmental footprint' methodologies, in particular the definition of product categories for which it could be applicable cost-effectively, depending on the complexity of products;
- the 'environmental footprint' methodologies are 'work in progress' and should be used only on a voluntary basis. International established methodological approaches already exist (e.g. ISO 14040, CEN/TC 350, etc.) and it is up to each company to apply these approaches;
- a comprehensive assessment, including compliance costs, will be made at the end of the pilot projects even before studying the possibility of linking these methodologies with product policy instruments;
- stakeholders must be closely involved in all further work, in particular the pilot projects;
- all this is done to avoid undermining and causing confusion around policy developing as part of the Roadmap to a resource-efficient Europe, including an indicators framework, and important global initiatives.

I count on you to take BUSINESSEUROPE's views into account when finalising this important communication on the Single Market for Green Products.

Yours sincerely,



Markus J. Beyrer