



American Center for Life Cycle Assessment
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22 August 2009

Mr. Ron Buckhalt,
USDA, Office of the Assistant Secretary for Administration
Room 342, Reporters Building
300 Seventh Street, SW
Washington, DC 20024

Re: USDA RIN 0503-AA35
Proposed Voluntary Labeling Program

Dear Mr. Buckhalt:

The American Center for Life Cycle Assessment, representing the environmental life cycle assessment community in the United States, wishes to comment on the proposed rulemaking for bio-based products labeling.

We understand that the federal purchase of biobased products is required under law, and that up to this point, these products were required to be evaluated using life cycle assessment (LCA), specifically using the Building for Environmental and Economic Sustainability (BEES) program of the National Institutes of Standards and Technology. With the BEES analyses in place, purchasers have been able to better understand the environmental impacts and aspects of biobased products. And by undertaking BEES analyses, biobased product manufacturers have been able to set themselves apart from other manufacturers in their proactive stance toward environmental issues, thereby generating environmental awareness in the biobased community and beyond.

We are therefore very concerned that the proposed labeling program has eliminated the requirement to perform an LCA. Fundamentally our concerns have these four sources.

1. Biobased products have significant impacts on climate change, biodiversity, food security, and many other impact categories. Impacts that can be larger than those of the products they replace. The impacts may be mitigated through improved management at the farm or forest, and during processing. But without the application of LCA to these products, it is impossible to tell what actions should be pursued to make these products more environmentally friendly. Nor will purchasers have the opportunity to discover whether these biobased products are environmentally preferable.
2. By omitting the requirement for an LCA-based labeling program, the USDA is losing a major opportunity towards the global competitiveness of US Agricultural Products. In Europe and other parts of the world, efforts are underway to require LCA based ecolabels (called Environmental Product Declarations) for all consumer products. The deadline for the national EPD program of France is 1/1/11, and we anticipate that the rest of Europe will follow not long after.

Walmart has recently announced its plans to require LCA data from all its vendors, with the intent to provide a label for everything it sells. Unless the US capacity for LCA is brought up rapidly, US companies could lose both the European and the domestic Walmart markets. Requiring biobased products to undergo an LCA would help significantly in developing LCA capacity in the biobased industry in the United States.

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3. USDA's proposed biobased label does not follow the international consensus standards on ecolabels (the ISO 14020 series) because it does not take environmental life cycle consideration into account. These standards are the basis of the French program and other programs under consideration world-wide. Recently, the US Patent and Trademark Office has expressed strong support for private sector led and public sector supported standards systems such as these ISO standards.
4. USDA is missing an opportunity to build overall LCA capacity and competitiveness in the US. Requiring LCAs of bio-based products would help supply US average data on their environmental impacts. Previous data collected through the BEES program have been lodged in the US Life Cycle Inventory Database, a freely available database owned by the Department of Energy. Data lodged there can be used as a teaching tool by educators, and by companies for their LCA studies, thus reducing the costs of agricultural LCAs, increasing the sustainability understanding of the public, and increasing the competitiveness of US economy.

We urge USDA to reconsider the elimination of environmental LCAs from their biobased products labeling scheme. Its inclusion made the program a strong driver for sustainability and helped biobased American products be more competitive not only through federal purchases but also in national and international markets.

Respectfully yours,



Rita Schenck
Secretary, American Center for Life Cycle Assessment