



American Center for Life Cycle Assessment
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19 February 2010

Anne Caldas
Director, Procedures and Standards Administration
American National Standards Institute
25 West 43rd Street, 4 floor
New York, NY 10036

Re: Leonardo Academy SCS-02 proposed national standard

Dear Ms Caldas:

The American Center for Life Cycle Assessment, representing the US Life Cycle community wishes to express its strong opposition to the direction of the proposed ANSI standard Type III Life Cycle Impact Profile Declarations for Products and Services (SCS-002).

Our primary objection is that the standard appears to be attempting to develop a life cycle impact assessment methodology through the standardization process, rather than through the basic environmental science research environmental impact assessment requires.

We are further concerned that its starting point, Life Cycle Stressor-Effects Assessment (LCSEA) is a proprietary methodology that does not represent LCA practice in the U.S. or elsewhere in the world. We have performed a scientific literature review for the use of comprehensive life cycle impact assessment methods with the following results:

- 449 CML (a method developed by a university in the Netherlands)
- 439 Eco-indicator 99 (a method developed by a consulting company in the Netherlands)
- 149 EDIP (a method developed by researchers for the Danish government)
- 100 Impact 2002 (A method developed in the EU)
- 85 TRACI (a method developed by the U.S EPA)
- 9 LCSEA (a method developed by Scientific Certification Systems)

All the references using LCSEA were written by SCS employees.

Adopting a company specific method as the basis of an American national standard, would surely be a mistake. It would be tantamount to providing a monopoly to SCS, rather than a recognition of and harmonization of existing methods, notably those adopted by the US EPA.

We urge you to withdraw support for this standard. Its topic is inappropriate for standardization and its starting point represents a methodology that is not adopted in the life cycle scientific literature. Instead, we believe the best approach is to convene a workgroup to identify the needed scientific research and to cooperate in seeing that the research is performed and the knowledge integrated into a U.S. approach to life cycle impact assessment.

Respectfully yours,

The American Center for Life Cycle Assessment

**The American Center for Life Cycle Assessment is a program of the
Institute for Environmental Research and Education**

