



May 18, 2015

Submitted Electronically

Docket Number: EPA-HQ-OPPT-2014-0838

Public Comments on Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement

Ms. Julie Shannon
Chemistry, Economics, and Sustainable Strategies Division
Office of Pollution Prevention and Toxics
Environmental Protection Agency
1200 Pennsylvania Ave, NW
Washington, DC 20460-0001

Dear Ms. Shannon,

UL LLC appreciates the opportunity to comment on the Environmental Protection Agency (EPA) request for comments on Notice EPA-HQ-OPPT-2014-0838FRL-9923-58 “Agency Information Collection Activities; Proposed Collection and Comment Request; Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement” (the Notice).

UL is a mission-driven, global, independent, safety science company with more than a century of expertise dedicated to promoting safe living and working environments. Since our founding in 1894, UL’s engineers and staff have helped develop safety standards and product-testing protocols, conducted independent product safety testing and certification, and inspected manufacturing facilities around the world. UL is driven by our global safety mission, which promotes safe living and working environments. Further, UL also participates in many international standards development technical committees as well as international conformity assessment schemes and national certification programs in an effort to continually advance our mission, and to work towards international harmonization where possible.

Building on our product safety expertise and history, UL also develops standards for sustainable products, tests and evaluates product chemical emissions, manages several environmental certification programs, and certifies environmental product declarations in accordance with established product category rules. UL’s sustainability-focused certifications and programs, such as GREENGUARD and ECOLOGO[®], are recognized and referenced in more than 1,000 sustainable product specifications and purchasing guidelines. Additionally, UL is the exclusive provider of GREENGUARD Certification for products that meet stringent chemical emissions requirements and ECOLOGO Certification for products that meet multi-attribute, life cycle-based sustainability standards.

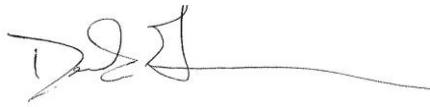
UL is keenly aware of the impact that “greenwashing” has on consumer and institutional purchaser decision-making. Our “Sins of Greenwashing” reports (<http://sinsofgreenwashing.com/>) illustrate how prevalent the practice is and the need for robust ecolabels to help instill confidence that consumers are making informed choices. For these reasons, we applaud EPA’s efforts to assess environmental performance standards and ecolabels for use in federal procurement and are eager to have our standards and

labels included in the pilot projects for building flooring, paints/coatings/removers, and furniture.

In addition to volunteering our ecolabels for evaluation in the pilot, UL is also interested in participating in the "purchase category panels" being formed to develop the product category checklists against which the various labels will be evaluated against.

UL would be pleased to further discuss the content of our submission with you and your team. Please contact me with any questions. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Derek Greenauer', with a long horizontal line extending to the right.

Derek Greenauer
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CC:
Mark Rossolo, Manager, Public Affairs, UL Environment