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World Wildlife Fund's Position and Comments Regarding EPA-HQ- OPPT-2014-0838 Agency Information Collection Activities; Proposed Collection and Comment Request; Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement

For almost 50 years, World Wildlife Fund (WWF) has been protecting the future of nature. Today WWF is the largest multinational conservation organization in the world, with programs in more than 100 countries, 1.2 million members in the United States, and more than 5 million members worldwide.

WWF thanks you for this opportunity to comment on the multi-stakeholder panel member criteria/qualifications and submits the comments below on behalf of our organization and our members.

WWF would like to commend the efforts of the US Environmental Protection Agency (EPA), General Services Administration (GSA) and other federal agencies and departments who have had a hand in drafting these guidelines and designing the pilot programs. The exercise is particularly valuable as it assists in forming a more consistent and concerted approach toward the use of voluntary labels and standards in federal purchasing to reflect leadership in procurement.

Criteria and qualifications for selection to multi-stakeholder panel

WWF supports the criteria proposed for selection to the multi-stakeholder panel –

- Knowledge of the environmental and/or human health impacts of the particular product category.
- Experience working with diverse stakeholders towards consensus.
- Familiarity with the draft Guidelines and Federal sustainable acquisition mandates.
- Familiarity with standards development and conformity assessment approaches.
- Ability to devote the necessary time to the panel (including one meeting and regular conference calls).
- Willingness to sign a conflict of interest disclosure form.

However, we suggest the first bullet be amended to read –

- Knowledge of the environmental, human health, *and/or social* impacts of the particular product category.

It is likely that the ecolabels that will be reviewed as part of the assessment pilots will include broader social impacts in their monitoring and evaluation – beyond human health. Having experts on the multi-stakeholder panels that can evaluate these social metrics against the Guidelines on the Environmental Effectiveness of the Standards will generate a more thorough pilot outcome that addresses potential unintended consequences of considering environmental impacts alone.

Conclusion

WWF welcomes the opportunity to comment and would be happy to provide further information or clarifications if necessary.

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