

## Clapp, Brian

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**From:** Brad Miller <bmill@bifma.org>  
**Sent:** Monday, April 20, 2015 6:02 PM  
**To:** Clapp, Brian  
**Cc:** Kinn, Alison; Shannon, Julie  
**Subject:** Re: Request for Assistance; "Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement" ICR

Hello Brian,

We would like to provide input on your questions and wish to have the ANSI/BIFMA e3 Furniture Sustainability Standard and the level Certification Program reviewed as part of the pilot program.

I do not believe that the data that EPA seeks under this Information Collection Request is already available or systematically collected by other agencies. It seems that what is being sought will be critical in terms of determining how well existing standards and ecolabels would measure up to the EPA Guidance.

Electronic submission is a nice option that expedites the process for all parties. I don't know that a high security PIN or password system is necessary. I wouldn't think there would be any danger of confidential documents being required to ascertain what is necessary for the request. A jpeg of an electronic "signature" should be the maximum unique requirement if even that is needed.

EPA's estimated burden and costs seem reasonable. This Assessment of Environmental Performance Standards and Ecolabels is urgently needed so that federal procurement professionals can make more fully informed decisions when making purchasing decisions.

Sincerely,

Brad Miller

# BIFMA

Director of Advocacy & Sustainability  
678 Front Ave. NW, Ste. 150  
Grand Rapids, MI 49504-5368  
616-285-3963  
[bmill@bifma.org](mailto:bmill@bifma.org)  
[www.bifma.org](http://www.bifma.org)

On Apr 20, 2015, at 2:59 PM, Clapp, Brian <[Clapp.Brian@epa.gov](mailto:Clapp.Brian@epa.gov)> wrote:

Mr. Miller -

On March 19, 2015, EPA published a Notice in the Federal Register (80 FR 06275) titled "Agency Information Collection Activities; Proposals, Submissions, and Approvals: Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement; EPA ICR No.

2516.01, OMB Control No. 2070-new." (See <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2014-0838-0001>) This Notice refers to EPA's intention to request new Office of Management and Budget (OMB) clearance of an information collection related to the assessment of environmental performance standards and ecolabels for Federal procurement.

In addition to the public notice and comment requirement that the above Notice initiates, OMB regulations at 5 CFR 1320.8(d)(1) require agencies to consult with potential respondents and data users about specific aspects of an information collection request (ICR) before submitting it to OMB for review and approval, regardless, in the case of ICR renewals, of whether changes have or have not been made to the collection activity.

As part of this required consultation, I am contacting you to solicit your input. Please note that if you take this opportunity to provide input, your name, affiliation, e-mail address, phone number and any information you provide (e.g., copies of e-mails) will be incorporated and attached to the ICR supporting statement, which will be a public document. In addition, the OMB Desk Examiner for the ICR in question may contact you to verify the accuracy of any comments EPA identifies in the ICR.

EPA solicits your input on the following questions:

Are the data that EPA seeks under this ICR available from any public source, or already collected by another EPA office or by another agency? If so, where can the data be found?

Is it clear what is required for data submission? If not, are there any suggestions for clarifying instructions?

Would you be interested in an electronic/data submission option? What type of alternative would you be most likely to utilize – web form, diskette, CD-ROM?

For electronic submission, how should signature requirements be handled – Private Key Infrastructure, PINS and passwords, signed paper cover sheet?

Do you agree with EPA's estimated burden and costs (the ICR addresses only the costs associated with paperwork)? Are the Bureau of Labor Statistics (BLS) labor rates accurate? If you have any reason to consider the BLS labor rates as used by EPA inaccurate or inappropriate, explain your rationale.

To access the Federal Register Notice, the ICR supporting document, and any public comments received to date, go to:

o [www.regulations.gov/](http://www.regulations.gov/)

o enter EPA-HQ-OPPT-2014-0838 in the Enter Keyword or ID field

o click on "Search"

o then click on any of the documents listed within the docket to read the document; you will be most interested in the Supporting Statement, identified by its title beginning "Information Collection Request..."

Your response will be greatly appreciated. If you have any comments in response to the above questions, or with respect to any other part of the information collection, please respond by return e-mail by May 18, 2015. EPA will consider those responses, as well as any public comment received in response to the Federal Register Notice identified above, in preparing a final document for OMB review.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me.

Brian Clapp, Environmental Protection Specialist  
Chemistry, Economics, and Sustainable Strategies Division  
Office of Pollution Prevention and Toxics/Office of Chemical Safety and Pollution Prevention  
Environmental Protection Agency  
Washington, DC 20460  
202-564-8838