



SCS Global Services
2000 Powell St, suite 600
Emeryville, CA 94608

May 18, 2015

To Whom It May Concern:

I am writing today on behalf of SCS Global Services (SCS), a neutral 3rd party standards development and ecolabel certification body. SCS would like to request participation as a stakeholder and offer three ecolabel standards for consideration to include as part of the US EPA pilot program to assess the *Draft Guidelines for Product Environmental Performance Standards and Ecolabels for Voluntary Use in Federal Procurement*.

With over 30 years' experience as an ecolabel standards developer and ecolabel conformity assessment body, we believe that SCS is well-suited for participation as a stakeholder in the pilot program. SCS is requesting participation as a stakeholder in one or more of the following product categories, all of which we have extensive experience: building flooring, paints/coatings/removers, and furniture. SCS meets the following criteria:

- Knowledge of the environmental and human health impacts for the product categories of building flooring, paints/coatings/removers, and furniture.
- 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.

In addition, the following are some specific examples of SCS' experience relevant to the pilot program. SCS has developed numerous standards through the ANSI and ISO processes, as well as with private industry. SCS is accredited by ANSI to ISO 17065, the international standard for certification bodies conducting conformity assessments. SCS is familiar with the executive orders and federal guidelines for EPP procurement, as well as the EPA draft guidelines for Product Environmental Performance Standards and Ecolabels. SCS has also been at the forefront of pioneering work on life cycle assessment, including the analysis of environmental and human health impacts associated with products.

SCS would be represented by Keith Killpack, Manager of the Life Cycle Assessment program at SCS. Keith has many years' experience the field of ecolabels including 4 years' experience as a life cycle assessment practitioner, examining the cradle-to-grave environmental impacts for products used in the

built environment. He has worked towards consensus-based solutions with diverse stakeholders including experience working with NSF International, BIFMA, and furniture manufacturers to develop a Product Category Rule (PCR); worked with NSF 140 Sustainable Carpet Standard Joint Committee; and moderated a group of stakeholders to develop a PCR for steel construction products. He has conducted conformity assessments to the NSF 140 Sustainable Carpet standard, and has been following the Federal procurement mandates, and development of the EPA draft guidelines. In addition, he will devote the time necessary to participate in the panel, and is willing to sign a conflict of interest form.

SCS would also like to offer three ecolabel standards for consideration for testing in the pilot program for the product categories of building flooring, paints/coatings/removers, and furniture.

- For the category of building flooring, SCS proposes the FloorScore® standard, a rigorous conformity standard and ecolabel for the assessment of VOC emissions from flooring products. This standard was developed jointly by SCS and the Resilient Floor Coverings Institute (RFCI) and is based on California 01350 air emission criteria.
- For the category of paints/coatings/removers, SCS proposes the SCS Indoor Advantage Gold certification standard, one of two leading standards in the industry. This standard applies to products used in the built environment, including coatings, and assesses products for VOC emissions following the California 01350 air emission criteria.
- For the category of furniture, SCS proposes the SCS Indoor Advantage and Indoor Advantage Gold standards. These standards evaluate the VOC air emissions of furniture, and other building interior products, based on the California 01350 air emission criteria.

SCS would welcome any questions about participation in the stakeholder panel, or the proposed FloorScore®, Indoor Advantage, and Indoor Advantage Gold Standards, and their suitability to the EPA's pilot program.

Sincerely,



Keith Killpack
SCS Global Services
Manager, Life Cycle Services
kkillpack@scsglobalservices.com
(510) 452-8047