

Mar. 23, 2015

Document Control Office (7407M)
Office of Pollution Prevention and Toxics (OPPT)
Environmental Protection Agency
1200 Pennsylvania Ave. NW.
Washington, DC 20460-0001

Re: Comments on the Criteria/Qualifications that will be Used for the Selection of the Multi-stakeholder Panel Members and Expression of Interest as Ecolabel Programs to be Assessed per the Draft Guidelines (Docket ID: EPA-HQ-OPPT-2014-0838)

To Whom It May Concern,

TÜV Rheinland appreciates the opportunity provided by EPA to comment on the criteria/qualifications that will be used for the selection of the multi-stakeholder panel members and to express interest as ecolabel program to be assessed per the draft guidelines for product environmental performance standards and ecolabels for voluntary use in Federal procurement.

TÜV Rheinland, founded more than 140 years ago, is a global leader in independent testing, inspection and certification services. The Group maintains a presence at around 500 locations in 66 countries with 18,000 employees. The independent TÜV Rheinland experts stand for quality and safety for people, the environment, and technology in nearly all aspects of life. TÜV Rheinland evaluates technical equipment, products and services, oversees projects and helps to shape processes for companies. Its experts train people in a wide range of careers and industries. TÜV Rheinland employs a global network of approved labs, testing and education centers. Since 2006, TÜV Rheinland has been a member of the United Nations Global Compact to promote sustainability and combat corruption.

To help manufacturers promote their eco-friendly products with one mark in a faster, more direct and efficient way, in January 2012, TÜV Rheinland launched Green Product Mark scheme, which is a voluntary environmental label for products that will give consumers and buyers guidance in identifying green and sustainable products in the often crowded market place. The Green Product Mark, along with the relevant regulatory requirements, aims to minimize the impact of products on the environment.

TÜV Rheinland is committed to helping institutional buyers to distinguish environmentally preferable products from others through the good practice of environmental labelling scheme operation. To test the effectiveness of the draft guidelines for product environmental performance standards and ecolabels for voluntary use in Federal procurement, **TÜV Rheinland volunteer to participate in the pilot project in 2015 to undergo the assessment against the draft guidelines for three pilot product categories.** TÜV Rheinland would also be committed to continuously contributing to the refinement of draft guidelines.

TÜV Rheinland's comment on criteria/qualifications for the selection of the multi-stakeholder panel members is as below:

- It would be suggested that "Knowledge of Green Building Certification/Rating Scheme (e.g. LEED; Green Globes)" be added into multi-stakeholder panel member criteria/qualifications. Eco-labels for those three pilot product categories (furniture, building flooring, and building paints/coatings/removers) constitute significant credits under prevailing green building certification/rating schemes. Understanding the logic of green building certification/rating system would in turn facilitate the interpretation of eco-labelling requirements.

We look forward to contributing to the future evaluation process of the draft guidelines as a member of stakeholder panel and participating as an eco-label program owner in the pilot assessment against the draft guidelines. Should you have any question regarding the comment or EoI I provided, pls contact me via fallight.xu@tuv.com .

Sincerely Yours,



Fallight Xu

Head of Green Solutions

TÜV Rheinland