



April 29, 2022

Via electronic submission to regulations.gov

Office of Chemical Safety and Pollution Prevention
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Agency Information Collection Activities; Proposals, Submissions, and Approvals: Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement; Docket ID No. EPA-HQ-OPPT-2014-0838

To whom it may concern:

The Resilient Floor Covering Institute (RFCI) appreciates this opportunity to provide comments to the United States Environmental Protection Agency (EPA) regarding its Information Collection Request (ICR) in connection with its Assessment of Environmental Performance Standards and Ecolabels for Federal Procurement (87 Fed. Reg. 11426 (Mar. 1, 2022)).

Attached please find comments of RFCI's technical consultant Jane Rohde regarding this ICR. If you have any questions regarding these comments or if RFCI can provide additional information regarding this topic, please contact me (Bill.Blackstock@RFCI.org) or RFCI legal counsel Allison Foley, Venable LLP (ADFoley@Venable.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Bill Blackstock', is written over a light gray rectangular background.

Bill Blackstock
President and CEO, RFCI

Attachment

File name: Attachment1_Section IV.14_Machine readable directory.

The following comments relate to the referenced language contained in the document titled: “ADDENDUM: Changes in the 2022 Update of the United States Environmental Protection Agency’s Framework for the Assessment of Environmental Performance Standards and Ecolabels for Federal Purchasing.”¹

Reference Language:

SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS

New criteria: IV.14 – L – **Machine readable directory.** The ecolabel program’s public directory of conformant products/services and their brand owner (as covered in IV.6) provides the directory in such a way that other programs can efficiently access the information, and the data are “machine readable”.

Comment: “Machine Readable” does not equate to the inclusion of an application program interface (API) that connects one programmable database to another to easily access information, which based on the *Criterion* and *Evidence* section of the updated Framework recommendations, appears to be the goal. It is assumed that “Machine Readable” as referenced here would be “digitized” information that can be “digitally scanned.” For example, the [OpenEPD](#) – an open data format developed by Building Transparency – allows for the data to be extracted in a consistent manner when digitized into the Embodied Carbon Construction Calculator (EC3) database and tool. However, some ecolabels and certifications do not include data that needs to be extracted, as they are compliant with a standard or other guideline that is consensus based, and there is a certificate that is needed by the specifier for documentation demonstrating third party verification and compliance to an environmentally preferable product program and/or building rating system. In working as a specifier and sustainability consultant, utilizing Mindful Materials, Sustainable Minds Transparency Catalogue, and ecomedes (including SFTool, Business and Institutional Furniture Manufacturer’s Association (BIFMA), and RFCI product category specific databases and manufacturer dedicated databases) that include a direct link to the declaration (e.g., Environmental Product Declaration (EPD), Health Product Declaration (HPD)) or certificate (e.g., FloorScore, Level), it would not be helpful to the specifier or procurement agent to have digitized information, but only the certificate, declaration, embodied carbon (Global Warming Potential (GWP)) information, etc. Therefore, the following proposed language is provided for consideration:

Proposed Language:

SECTION IV: MANAGEMENT OF ECOLABELING PROGRAMS

IV.14 – L – **Ecolabel access.** The ecolabel’s Program Operator public directory of conformant products/services and their brand owner (as covered in IV.6) provides a directory of certified products and support documentation that can be publicly accessed

¹ Available at https://www.epa.gov/system/files/documents/2022-02/updated-framework-addendum_020222.pdf.

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and is available for other public material and product databases directly through an API and/or a link that provides the documentation required demonstrating compliance to an accepted ecolabel.

Clarification Impacts: By providing ease of public access to information that is downloadable and retrievable, the procurement agent and/or specifier can easily compile the various sustainability and health and wellness ecolabels required for compliance to the Environmentally Preferable Purchasing (EPP) Program. Although some databases benefit from the utilization of digitized information for furthering accuracy within their collection process of data, this would not always be relevant to various types of ecolabels that would be required by EPA and/or used by the procurement agent or specifier. The current language combines both access (which is the goal) and the electronic process for collecting data, which is certification or data specific, not ecolabel specific. Therefore, the revised language is recommended for consideration for usability in support of compliance to the EPP Program. The current language could be confusing as well as onerous for compliance by those certifying products based on the type of ecolabel being provided (e.g., ecolabels based on product category specific and/or process and production method (PPM) standards).

Thank you for considering these comments.

Respectfully submitted,

Jane M. Rohde, Technical Consultant
Resilient Floor Covering Institute

Additional commenter credentials and experience:

Jane M. Rohde, AIA, FIIDA, ASID, ACHA, CHID, LEED AP BD+C, GGA-EB, GGF
Principal, JSR Associates, Inc.
Technical Consultant, Resilient Floor Covering Institute

Ms. Rohde is a registered architect and certified interior designer and certified by the American College of Healthcare Architects (ACHA) and the American Academy of Healthcare Interior Designers (AAHID). As a consultant for RFCI, Ms. Rohde has led the task force for developing the now public-facing resilient floor covering product category on Building Transparency's EC3 tool, collaborated with the ecomedes® team to develop a resilient floor covering dedicated product sustainability database, and has served as part of the Joint Committee for the revision of the NSF/ANSI 332 Sustainability Assessment for Resilient Floor Coverings anticipated for publication on May 15, 2022. In addition, Ms. Rohde sits on the General Services Administration (GSA) Green Building Advisory Committee (GBAC), participates as a consultant on the ASHRAE 189.1 Standard Development Committee: WG08 Indoor Environmental Quality and WG09

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Materials Work Groups, and is a voting member on the ASHRAE 189.3 Standard Development Committee and participates specifically in WG08 Indoor Environmental Quality and WG09 Materials Work Groups.