



December 24, 2009

Emile Monette
Director, Program Analysis Division
U.S. General Services Administration
2200 Crystal Drive
Arlington, VA 20406

Dear Mr. Monette:

The Coalition for Government Procurement appreciates the opportunity to comment on the requirements of Section 13 of Executive Order 13514, *Recommendations for Vendor and Contractor Emissions*.

The Coalition for Government Procurement (CGP) is a non-profit association of over 350 firms selling commercial services and products to the federal government. Our members comprise small, medium, and large businesses actively engaged in federal business. Our members collectively account for approximately 70% of the sales generated through the GSA Multiple Award Schedules program and about half of the commercial item sales made to the government each year.

The CGP's Green Committee was founded a year ago to offer members and green acquisition leaders in the federal government an increased opportunity to exchange ideas. The Coalition supports the federal government's initiatives related to greening the government and environmentally preferable acquisition. There has been much interest and innovation from member companies to increase the level of sustainable products available to the federal community that offer recycled content, low toxicity, and are water and energy efficient. This commitment also extends to corporate practices and in some cases, the measurement of greenhouse gases (GHG's).

The Coalition is in favor of a practical approach to the implementation of Section 13 and suggests the use of existing sustainability programs within the federal government and using an incentive based process rather than required minimums. Because our association is made up of small, medium, and large business across multiple industries, we especially encourage the General Services Administration (GSA) to consider the varying impacts on these sectors. Small businesses, for example, may not have the resources in order to quantify carbon footprint. Federal acquisition relies on a broad

supplier base, and there is concern that requiring specific minimums could inadvertently disadvantage small firms and others with specific socioeconomic preference in federal procurement. Where minimums are being considered, the Coalition recommends long phase-in times in order for contractors and vendors to prepare.

While some companies have implemented greenhouse gas reduction programs, the federal government should be aware that many are voluntary and prevalent only in certain industries. A good resource to identify these organizations is the Global Reporting Initiative at www.gri.org. Independent voluntary sustainability/GHG inventory disclosure or supporting organizations include the Global Reporting Initiative (GRI), World Business Council for Sustainable Development (WBCSD), International Energy Agency (IEA), and the Sustainable Forest Products Industry (SFPI). Again, it is noteworthy that the prevailing approach is voluntary.

Still, much uncertainty exists as to how to measure the amount of greenhouse gas emissions used in the manufacture of products as well as how to define a green service. These issues were the two primary concerns expressed by Green Committee members on the subject of Section 13. There is concern about the adoption of a government-only GHG standard or choosing an existing one that draws an arbitrary line creating firms that comply and do not comply based on one green attribute (i.e. GHGs). Industries vary in their approach to reducing the environmental impacts of their business, for some it may be focused on providing greener products and others may have an overall environmental commitment to how they do business from a corporate perspective. The Coalition asks that GSA, the Council on Environmental Quality, and the Office of Federal Procurement Policy retain some flexibility in the implementation of Section 13 so that a variety of businesses and industries will be able to participate.

In addition, the definition of a green service and how GHG emissions should be measured by service providers remains in question. Also how will fair and reasonable measurement and evaluation of carbon footprint for individual service providers be ensured if standards do not exist? The Coalition is aware that this issue is currently being discussed within GSA, and would be happy to review and comment on any draft definitions.

The Coalition also offers some additional questions for the Section 13 Working Group to consider as they discuss recommendations for scope 3 greenhouse gas emissions, bolded in green below.

Recommendations for Vendor and Contractor Emissions

- A. Feasibility of requiring vendors and contractors to register with a voluntary registry or organization for reporting greenhouse gas emissions
 1. *Which major manufacturing companies, industries **or service providers** already track GHG inventories?*

2. *What independent voluntary GHG inventory disclosure organizations exist –for products and/or for services? What information do they collect, how often do they collect the information, how do they publicly disclose the information that is collected, and how many and what types of organizations disclose their GHG inventories to them?*
- B. Feasibility of requiring contractors, as part of a new or revised registration under the Central Contractor Registration or other tracking system, to develop and make available its greenhouse gas inventory and description of efforts to mitigate greenhouse gas emissions
1. *Is a standardized GHG inventory tool available and is it being used by these Federal programs?*
 2. *What is the ROI for requiring the GHG to be reported especially if a new system needs to be developed?*
- C. Feasibility of using Federal Government purchasing preferences or other incentives for products manufactured using processes that minimize greenhouse gas emissions
1. *Are changes to the FAR needed in order to require Federal suppliers to develop and make available GHG inventories? (Before any FAR changes are considered, the government needs to make sure that the definitions of GHG footprints especially as they apply to Federal service providers vice Federal product suppliers are clear and acceptable to industry.)*
 2. *How can the government best transparently convey the overall sustainability of a supplier of products and/or services?*
- D. Feasibility of other options for encouraging sustainable practices and reducing greenhouse gas emissions
1. *How will the Federal programs deal with the issue of green services, which would likely give preference to companies with neutral or negative carbon footprints or to companies that are currently measuring and reporting their carbon footprint and have a plan to reduce their emissions?*
- E. Potential impacts on the procurement process
1. *How can the Federal government strategically transform procurement into a sustainable operation, including empowering acquisition professionals? (Comment: One way is to eliminate paper required deliverables and eliminate required hard copy proposal deliveries.)*
- F. Potential impacts on the Federal vendor and contractor community (including small businesses and other socioeconomic procurement programs)
1. *What is the potential impact on the small business community should the tracking and reporting of GHG data be required? What is the true Federal Government ROI involved if the small businesses are required to track and report GHG data?*

The Coalition for Government Procurement also supports the Business and Institutional Furniture Manufacturers Association (BIFMA) recommendations in response to Section 13 of the Executive Order, especially the use of the new e3 Furniture Sustainability Standard as a tool for the government to track and reduce greenhouse gases in the furniture industry.

The CGP's Green Committee would like to extend an invitation to meet with GSA officials the week of January 11th to discuss this issue in further detail. Thank you again for inviting the Coalition for Government Procurement's input and we look forward to working closely with GSA on how to potentially reduce scope 3 greenhouse gas emissions.

Best regards,

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The Coalition for Government Procurement