



**The Coalition
for Government
Procurement**

July 28, 2011

Nancy Gillis
Director
Federal Supply Chain Emissions PMO
General Services Administration
1800 F Street, NW
Washington, DC 20405

Re: Ecolabels

Dear Ms. Gillis,

The Coalition for Government Procurement would like to thank the General Services Administration (“GSA”) for sharing the work of the *Section 13 Interagency Environmental Product Standards and Labeling Sub-group* at the listening session held on July 14th. We would especially like to thank Brennan Conaway for his presentation and for engaging with our members on ecolabels in federal procurement. The Coalition sincerely appreciates GSA’s openness and willingness to engage with industry on this issue.

At the briefing, the Section 13 sub-group described their work to establish a methodology for assigning ecolabels to products and services in federal procurement. We understand that the sub-group hopes to finalize a report of the methodology in the next 9 to 10 months and that the report will be available for public comment near finalization. The Coalition agrees that having public input is essential in the development of ecolabel guidelines. However, we believe that it would be more effective to solicit public feedback during the developmental stages of the methodology rather than waiting until the report is near final. In our experience, it can be difficult to incorporate significant changes in the final stages of such a project. Integrating stakeholder feedback earlier in the process will lead to more efficient results and a better product in the long run. We believe that this approach is more consistent with the spirit of transparency and the mission of the Office of Management and Budget “Myth-buster’s” campaign. The Coalition hopes that you will agree as well.

In a related matter, GSA has recently updated its green icons on *GSA Advantage!*. These icons play a significant role in helping government purchasers identify products with certain environmental attributes in accordance with EO 13514. Both agencies and industry are encouraged to use this system while the Section 13 project on ecolabels is ongoing. Unfortunately, the icons on *GSA Advantage!* are only a small fraction of those available for green products and services in the commercial market. The Coalition is very concerned that having only some icons listed, while leaving many comparable icons left out, unduly restricts

competition. As a result of the limited number of green icons available on *GSA Advantage!*, vendors who offer products and services that meet the requirements of EO 13514, but do not use the specific icons listed, are unable to promote their products' green attributes to many of their government customers. A perhaps unintended consequence of the use of a limited number of icons is that it has put the agency in the position of choosing winners and losers between competing environmental certification programs, leaving GSA at risk for accusations of anticompetitive behavior. The Coalition recommends that GSA adopt a more flexible approach to promoting green products on *GSA Advantage!* that is more brand-neutral and better reflects the abundance of green icons in the commercial market.

The Coalition sincerely appreciates GSA's efforts to engage with industry on this matter and we look forward to the opportunity to work further with the Section 13 Program Management Office on the issue of ecolabels in federal procurement.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Waldron', with a long horizontal flourish extending to the right.

Roger Waldron
President

cc: Dana Arnold, Brennan Conaway, Houston Taylor