



June 17, 2024

Jeffrey A. Koses
Senior Procurement Executive
General Services Administration (GSA)
1800 F St., NW
Washington, DC 20405

RE: GSA PFAS Inquiry

Dear Mr. Koses,

Thank you for the opportunity to submit comments in response to the Notice of Inquiry Regarding PFAS in Products published by GSA in the Federal Register on April 16, 2024.



By way of background, The Coalition for Government Procurement (“the Coalition”) is a non-profit association of firms selling commercial services and products to the Federal Government. Its members collectively account for a significant percentage of the sales generated through General Services Administration contracts, including the Multiple Award Schedule program. Coalition members include small, medium, and large businesses that account for more than \$145 billion in Federal Government contracts. We are proud to have collaborated with Government officials for 45 years promoting the mutual goal of common-sense acquisition.





The Coalition supports GSA’s efforts to increase the sustainability of the Federal supply chain in accordance with the President’s Federal Sustainability Plan, as well as GSA’s consideration of how it may help to reduce any potential negative impacts of per-and polyfluoroalkyl substances (PFAS) chemicals from products offered to the Government through GSA contracts. We also appreciate GSA’s request for input from the public, and its suppliers, on best practices in the commercial market for the identification of PFAS in commercial products, ecolabels, as well as potential cost and supply chain impacts if GSA were to eliminate or reduce the availability of products containing PFAS.


The recent update to FAR Part 23 on Sustainable Procurement provides a significant opportunity for GSA to reduce the purchase of products with PFAS in the categories in which GSA is considering whether to

pursue a rulemaking. In the RFI, GSA lists the following categories of products that it is considering targeting for such a rulemaking: furniture, carpets, rugs, curtains, cookware, food service ware, food packaging materials, cutlery, dishware, paints, cleaning products, stain and water-resistant treatments, flooring, and floor care products.

The updated version of FAR Part 23, effective May 22, 2024, strengthens Federal purchasers sustainable acquisition obligations by requiring that agencies “procure sustainable products and services to the maximum extent practicable,” including those that meet EPA Recommendations of Specifications, Standards and Ecolabels managed by the EPA’s Environmental Preferable Purchasing (EPP) program. Many of the ecolabels that the EPA currently recommends for Federal buyers include criteria that either restrict or eliminate PFAS in product categories that are the focus of GSA’s RFI. In addition, the EPP program recently updated its website so that the acquisition workforce can easily identify EPA recommended ecolabels that include PFAS criteria. These standards and ecolabels (listed below) apply to furniture, carpet, rugs, flooring, paints, cleaning, and cafeteria products.

Logo	Standard/Ecolabel	Product Category	Product Subcategory	Standard Type	PFAS Criteria
	BIFMA e3 2019 – Furniture Sustainability Standard - level® certified	Office/Furniture	Furniture	Multi-Attribute	Optional: Applicants can receive one product point if the product does not contain per- and poly-fluorinated compounds at or above 100 ppm.
	Cradle to Cradle Certified™ Product Standard	Construction; Office/Furniture	Adhesives; Carpet; Ceiling Tiles-Acoustical; Fiberboard, Gypsum Panels, and Wallboard; Flooring: tile, resilient, and other non-carpeted; Furniture; Insulation; Interior Latex Paint; Other Miscellaneous Building Finishes	Multi-Attribute	Required: Under Version 4.0 of the Standard, PFAS are prohibited in certified products at all certification levels. If present as an impurity or minor additive, the level must be <1000ppm or <100 ppm in any homogeneous material by weight for products certified at Bronze and Gold levels, respectively. Some exemptions apply

					for specific materials or parts
	International Living Futures Institute: Declare®	Construction; Office/Furniture	Carpet; Flooring: tile, resilient, and other non-carpeted; Furniture; Interior Latex Paint; Other Miscellaneous Building Finishes	Single-Attribute: Indoor Air Quality/VOC Emissions/Other Leadership Approaches to Chemicals	Required: Certified products and product packaging must not contain Perfluorinated and Polyfluorinated Alkyl Substances (PFAS) or Perfluorinated compounds (PFCs).
	Green Seal® 37 Standard for Cleaning Products for Industrial and Institutional Use	Custodial	Cleaners: carpet, glass, multipurpose	Multi-Attribute	Required: Under the most recent standard editions, PFAS are prohibited in certified products. If present as a contaminant, the level must be below 100 ppm.
	Green Seal® 41 Standard for Hand Cleaners for Industrial and Institutional Use	Custodial	Hand Soap	Multi-Attribute	Required: Under the most recent standard editions, PFAS are prohibited in certified products. If present as a contaminant, the level must be below 100 ppm.
	Green Seal® 53 Standard for Specialty Cleaning Products for Industrial and Institutional Use	Cafeteria	Commercial Dishwasher Detergent	Multi-Attribute	Required: Under the most recent standard editions, PFAS are prohibited in certified products. If present as a

					contaminant, the level must be below 100 ppm.
	International Living Futures Institute: Living Product Challenge™	Construction; Office/Furniture	Carpet; Flooring: tile, resilient, and other non-carpeted; Furniture; Interior Latex Paint; Other Miscellaneous Building Finishes	Multi-Attribute	Required: Certified products and product packaging must not contain Perfluorinated and Polyfluorinated Alkyl Substances (PFAS) or Perfluorinated compounds (PFCs).
	Safer Choice	Cafeteria; Custodial; Machine Shop Operations	Cleaners: carpet, glass, multipurpose; Commercial Dishwasher Detergent; Floor Care; Hand Soap; Parts Wash Solution	Multi-Attribute	Required: EPA's Safer Choice program requires every ingredient used in a product to meet the stringent hazard criteria of the Safer Choice Standard for the product to be eligible for Safer Choice certification. PFAS are not allowed in certified products, as they do not meet the Safer Choice Standard.

+Source: EPA Environmental Preferable Purchasing program's *Recommendations of Specifications, Standards, and Ecolabels for Federal Purchasing* webpage at www.epa.gov/greenerproducts/recommendations-specifications-standards-and-ecolabels-federal-purchasing.

By training the acquisition workforce on the new FAR Part 23 sustainable purchasing requirements and the specific ecolabels and standards that address PFAS, GSA can help to increase the procurement of products that either have eliminated or reduced quantities of PFAS.

If GSA elects to pursue a rulemaking, the Coalition recommends that GSA harmonize any new PFAS requirements with existing commercial standards and other state (e.g., California), international, and Federal agency requirements and their implementation timelines. Within the Federal government, we recommend that GSA engage with Federal agencies like the EPA, the Council on Environmental Quality, and the Department of Defense about whether to move forward with a governmentwide approach as it

pertains to reducing PFAS under Federal contracts. We strongly recommend that GSA avoid establishing unique requirements for only GSA contracts which would lessen the environmental impact (when it could be more broadly applied) and increase costs for contractors which increase barriers to doing business with GSA.

In addition to these general comments, the Coalition would like to share individual comments from member companies in the furniture, IT, and healthcare industries. The individual member comments can be found [here](#).

The Coalition appreciates GSA for considering industry's comments in response to the Notice of Inquiry Regarding PFAS in Products. If you have any questions, please contact Roger Waldron at rwaldron@thecgp.org or (202) 331-0977.

Sincerely,

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

Roger Waldron
President