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

Re: EPA's Role in Advancing Sustainable Products
Docket identification number: EPA-HQ-OPPT-2010-0768

Dear Office of Pollution Prevention and Toxics:

The Retail Industry Leaders Association (RILA) and its membership are pleased to submit comments on the above-noted sustainable products solicitation. RILA members believe that the EPA, through voluntary programs like ENERGY STAR and SmartWay Transport Partnership, has proven itself to be a valuable ally in supporting and advancing the environmental goals of the business community. We hope that the EPA can bring their resources to bear in collaboration with existing sustainable product working groups. Therefore, we propose several recommendations for a voluntary EPA program that would effectively accelerate and enhance ongoing sustainable product efforts without stifling the necessary innovation in that field through prescriptive regulations.

RILA is an alliance of the world's most successful and innovative retailer and supplier companies – the leaders of the retail industry. RILA members represent more than \$1.5 trillion in sales annually and operate more than 100,000 stores, manufacturing facilities and distribution centers nationwide. Its member retailers and suppliers have facilities in all 50 states, as well as internationally, and employ millions of workers domestically and worldwide.

The EPA should consider developing a voluntary multi-stakeholder partnership program that leverages existing efforts, identifies gaps in research and implementation, and works with industry to supplement and enhance their activities. Specifically, the EPA should consider:

- *Recognizing that the term “sustainable products” needs to be broadly defined to include environmental, social, and performance considerations, both in the US and globally. Environmental and social considerations must encompass the complete global product supply chain, including materials, production, distribution, use, and disposal. Performance considerations must include quality, availability, cost, as well as other product and packaging performance criteria.*
- *Collaborating with existing cross-sector, global sustainable product working groups.*

Existing groups, including the Outdoor Industry Association's Eco Index, the Sustainability Consortium, the Green Chemistry and Commerce Council, the Green Products Innovation Institute, the Apparel Coalition, and the Sustainable Packaging Coalition, are already developing valuable resources to advance sustainable product and packaging. It is important to note that these programs are successful precisely because they involve a diverse stakeholder mix of non-profits, industry, academia, and government. In order to effectively advance sustainable products, the EPA should engage with these existing organizations to understand their roles, and then determine their role in advancing a common agenda, noting that this needs to be a global effort.

- *Determining where research gaps exist and fill those needs.* The EPA can identify, map, and fill sustainable product research and funding gaps, including product LCAs, packaging, hazardous material alternatives, supply chain optimization, and consumer demand trends. One key area of focus that has not been thoroughly examined is product end-of-life management. Retailers' capabilities are not conducive to product take-back and prefer for the EPA to assist in enhancing existing waste & recycling infrastructure.
- *Standardizing product label and advertising claims.* Sustainable product claims and labels like "low-VOC" and "eco-friendly" are rapidly proliferating. The FTC is revising their "Green Guides" to guide claims on those subjects (See the recent FTC press release from Oct 6, 2010 at <http://www.ftc.gov/opa/2010/10/greenguide.shtm>). The EPA should provide support to the FTC to ensure claim accuracy and scientific legitimacy without compromising the pace of the FTC's efforts. The EPA can begin to provide their support by participating in the current open stakeholder comment period. Also, it is important to be mindful that some existing product certifications have a strong track record and need support to grow their consumer awareness (e.g. Forest Stewardship Council, Marine Stewardship Council), while others need to be verified, standardized, and consolidated with scientific rigor. Retailers believe that certifications and claims are only credible if they are based on quantifiable metrics or are third-party assured.

RILA already has a strong working relationship with the EPA on issues of environmental sustainability through the development of the EPA Retail Industry Portal: <http://epa.gov/retailindustry/>. Our members are leading sustainable product innovation and we appreciate the opportunity to remain involved in the development of EPA's sustainable product program. Feel free to contact us at any point.

Sincerely,



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